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Introduction

This document presents my decision for the Commercial Pack Stock Permit Reissuance for the Sierra National Forest. The environmental analysis is contained in the *Commercial Pack Stock Permit Reissuance and Trail Management Plan for the Dinkey Lakes Wilderness – Final Environmental Impact Statement*. The project area for this analysis includes non-wilderness areas of the Sierra National Forest and the Ansel Adams, Dinkey Lakes, John Muir and Kaiser Wildernesses. The decision related to commercial pack stock for the Ansel Adams and John Muir Wildernesses (AA/JM) was made in the Record of Decision (ROD) for the *2005 Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses – Final Environmental Impact Statement* (hereafter referred to as the 2005 Pack Stock Management FEIS). The analysis of commercial pack stock use in the AA/JM Wildernesses was completed in that document and is incorporated into this decision by reference. The uses analyzed and decided in the 2005 Pack Stock Management FEIS are assigned and authorized to specific pack stations in this decision. Decisions regarding the Trail Management Plan for the Dinkey Lakes Wilderness will be addressed in a separate ROD using the environmental analysis contained in the *Commercial Pack Stock Permit Reissuance and Trail Management Plan for the Dinkey Lakes Wilderness – Final Environmental Impact Statement* (hereafter referred to as the 2006 SUP FEIS).

For the purpose of this analysis the project area is divided into sixteen analysis units (AUs), shown in Figure 1.1. The planning area is in Mariposa, Madera, and Fresno Counties. The largest analysis unit is the Ansel Adams/John Muir (AA/JM), and comprises Wilderness areas analyzed in the 2005 Pack Stock Management FEIS. The other 15 analysis units were not covered in the 2005 Pack Stock Management FEIS. Of these 15, five are within wilderness: Kaiser (KAI), Dinkey Lakes (DIL), Coyote (COO), Helms (HEL), and Nelson (NEL). The remaining ten analysis units are outside of wilderness (see Table 1.1 and map below).

Table 1.1: Analysis Unit Abbreviations and Associated Commercial Pack Stations

Analysis Unit	Abbreviation[1]	Ranger District[2]	Wilderness	Pack Stations
Nelder	NED	BL	N/A	YTPS, MPS
Clover	CLO	BL	N/A	MPS
Edison	EDI	HS	N/A	D&F, HSPS
Chinquapin	CHQ	HS	N/A	D&F, HSPS
Florence	FLO	HS	N/A	D&F, HSPS, LVPS, MTR
Kaiser	KAI	HS	Kaiser	D&F
East Huntington	HNE	HS	N/A	D&F
West Huntington	HNW	HS	N/A	D&F
Coyote	COO	HS	Dinkey Lakes	CPO, D&F, HSPS
Dinkey Lakes	DIL	HS	Dinkey Lakes	CPO, D&F, HSPS
Helms	HEL	HS	Dinkey Lakes	CPO, D&F, HSPS
Nelson	NEL	HS	Dinkey Lakes	CPO, D&F, HSPS
Dinkey Front Country	DFC	HS	N/A	CPO
Tule Meadow	TUL	HS	N/A	CPO
Wishon	WIS	HS	N/A	CPO
Ansel Adams & John Muir	AA/JM	BL HS	AA/JM	All

Figure 1.1 - Map of Analysis Units

In April 2000, a lawsuit filed against the Inyo and Sierra National Forests alleged violations of the National Forest Management Act (NFMA), National Environmental Policy Act (NEPA), and the Wilderness Act regarding the commercial pack stock use permit process. The judge found in favor of the plaintiffs on the NEPA claim, determining that in authorizing the special use permits (SUPs) for the pack stations prior to 2001, the Forest Service failed to adequately document environmental impacts as required by the NEPA.

A Court Order was issued that required the Forest Service to complete a two step process for issuing commercial pack stock SUPs. First, a cumulative impact analysis of pack stock operations in the AA/JM Wildernesses was to be completed no later than December 2005. Secondly, by December 2006, the Forest Service was to complete a site-specific analysis for each permittee. This later requirement is fulfilled through this document. The court allowed all nineteen pack station operations on the Inyo and Sierra National Forests to continue to be authorized, with specified conditions and restrictions imposed by the court. The pack stations have been operating under this restriction since 2002. It should be noted that, due to this court injunction, the 2001 and 2005 wilderness direction have not been fully implemented as designed.

The Forest Service believes that when the District Court prescribed a focused two step NEPA process in their injunctive relief that the two environmental documents ordered were not meant to re-visit the same topics covered by the 2001 Wilderness Plan.

The 2005 Pack Stock Management FEIS addresses the AA/JM Wildernesses and the multiple pack stations using the two wildernesses in order to analyze the cumulative impacts of the pack stock operations. This was in contrast to our 2001 Wilderness Plan implementation schedule that identified individual analysis over the course of five years to accomplish the re-issuance of the commercial pack station permits. The decisions made in the 2005 ROD are specific to activities and levels commercial pack stock uses only within the AA/JM Wildernesses. The decisions being made in this 2006 EIS respond to the court order to reissue the SUPs, tiering to the 2005 decision so as to reduce redundancy and focus on the issues now ripe for decision. Since all the pack stations use areas beyond the two affected wildernesses subject to the court order, the decision before us now is to issue the SUPs. In doing so we are clearly within the guidance provided by Council on Environmental Quality (CEQ) regulations as stated below:

> **Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review** (Section 1508.28). Whenever a broad environmental impact statement has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action) the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action. The subsequent documents shall state where the earlier document is available. Tiering may also be appropriate for different states of actions. (40 CFR 1502.20)

Summary of the Decision

It is my decision to select Alternative 3 as presented in the 2006 SUP FEIS, without the Trail Management Plan for the Dinkey Lakes Wilderness. The Trail Management Plan for the Dinkey Lakes Wilderness is a separate Record of Decision. I believe Alternative 3 meets the purpose and need as stated in the FEIS, and meets our public service commitment to provide for use and enjoyment of National Forest System lands while protecting resources.

In order to implement the direction in Alternative 3, the Sierra National Forest intends to authorize new SUPs for the seven commercial pack stations based on the Sierra National Forest to provide pack stock supported services. Operations will occur in non-wilderness areas of the Forest as well as the Ansel Adams, Dinkey Lakes, Kaiser and John Muir Wildernesses. Alternative 3 also prescribes the management direction under which these pack stations will operate.

I have made my decision after careful review of the public comments on the Draft EIS prepared for this project pursuant to the NEPA.

Although I make this decision based upon the best information currently available to me, I do recognize some uncertainty and risk that comes with this decision. I expect that by placing an emphasis on adaptively managing these commercial uses to achieve prescribed conditions, we can actively manage these uses and continue to improve conditions over time. Adaptive

management will be used to ensure that impacts to wilderness character are avoided or mitigated, such that wilderness character is preserved.

Key Features of the Decision

Listed below are the key features of the management direction for the project area as described in Alternative 3, the selected alternative. The management actions and prescriptions will be incorporated into the SUPs.

Authorized Pack Stations and Services

The following pack stations will be authorized to operate pack stock supported services for the public on National Forest System lands:

1. Clyde Pack Outfitters (CPO)
2. D&F Pack Station (D&F)
3. High Sierra Pack Station (HSPS)
4. Lost Valley Pack Station (LVPS)
5. Muir Trail Ranch (MTR)
6. Minarets Pack Station (MPS)
7. Yosemite Trails Pack Station (YTPS)

The specific services, activities, uses and locations for each pack station are described in detail in Chapter 2 of the EIS, beginning on page 2-5. It is important to note that the number of permits granted was no more than was necessary to serve the public's need while still complying with the Wilderness Act. Muir Trail Ranch and Lost Valley only use the John Muir Wilderness and the environmental analysis is covered under the 2005 Pack Stock Management FEIS. This decision authorizes the issuance of a SUP. Every packer receiving a SUP is serving a demonstrated need and granting the permits will not degrade wilderness character.

Based on an administrative review of the applications it is anticipated that the Forest Service will issue Resort Special Use Permits for a term of 20 years, provided the applicants meet all requirements according to Forest Service policy.

Facilities

Existing facilities (buildings, corrals, etc.) that will be authorized are listed in the EIS, Appendix B (page B-1). Required modifications to existing facilities are listed in the EIS, Chapter 2, beginning on page 2-13.

Use Allocations – Dinkey Lakes and Kaiser Wildernesses, and Merced Wild and Scenic River (MWSR)

This decision implements a multi-layered approach to managing commercial pack station use in these areas. Similar to management in the AA/JM wildernesses, each pack station operation is assigned destination quotas and stock-at-one-time limits. Two pack stations are allowed in the Dinkey Lakes Wilderness, one pack station is allowed in the Kaiser Wilderness and one pack station is allowed in the MWSR. There are a total of 94 trips within 15 destinations allowed, as displayed in Table 1.2. Five designated stock camps are identified, and are the only locations where stock may be held overnight.

Table 1.2. Summary of destination zones quotas by pack station under Alternative 3. The destination zone quotas for the AA/JM are incorporated by reference from the *2005 Pack Stock Management FEIS (See Appendix C in the 2006 SUP FEIS)*

Analysis Unit	Destination Zone	CPO	D&F	HSPS	YTPS[3]
NED*	South Fork Merced Camp	-	-	-	16
Totals in Merced Wild and Scenic River		0	0	0	16
KAI	Walling Lake	-	12	-	-
	George Lake	-	8	-	-
	Nellie Lake	-	6	-	-
	Bill Lake	-	2	-	-
	Twin Lakes (Upper and Lower)	-	6	-	-
	Jewell Lake	-	2	-	-
	unassigned in Kaiser Wilderness [1]	-	4	-	-
Totals in Kaiser Wilderness		0	40	0	0
COO	Perkins Camp	-	2	-	-
	Rock Meadow	-	2	-	-
DIL	Island Lake	2	-	-	-
	2nd Dinkey Lake	2	2	-	-
	South Lake	-	4	-	-
NEL	Rock Lake	2	-	-	-
	Cliff Lake	8	-	-	-
	Nelson Lake	4	-	-	-
COO, DIL, NEL	unassigned in Dinkey Lakes Wilderness [2]	4	4	2	-
Totals in Dinkey Lakes Wilderness		22	14	2	0
Totals by Packstation		22	54	2	16

[1] Unassigned trips in the Kaiser Wilderness may be used at any established destination zone in the Kaiser Wilderness except for Walling Lake, George Lake, Nellie Lake, or Upper Twin Lake.

[2] Unassigned trips in the Dinkey Lakes Wilderness may be used at any established destination zone in the Dinkey Lakes Wilderness except for Cliff Lake.

[3] Three pack stations do not operate in the Dinkey Lakes, Kaiser and MWSR. MPS does not operate in the Dinkey Lakes, Kaiser Wilderness and MWSR. LVPS and MTR pack stations operate solely in the John Muir Wildernesses.

* Acronym titles can be found on page 1 and 4.

Use Allocations - Ansel Adams and John Muir Wildernesses

This decision assigns and authorizes certain uses identified in the 2005 Pack Stock Management FEIS ROD to the seven pack station operations. The 2005 ROD identified and analyzed the appropriate use levels in the AA/JM Wildernesses, but did not assign those use levels to specific pack stations. The use levels are based on destination management, and each pack station is given quotas for the number of spot/dunnage trips to each destination. Each pack station is also given a limit on stock in the wilderness at one time, as well as a limit on the number of all expense trips that can occur within the AA/JM Wildernesses.

Use Allocations – General

Overall use will be limited by the maximum authorized stock that a permittee can have on National Forest System lands at any time. In addition, where use occurs outside of one of the

wilderness areas, site specific management direction is provided for each situation were limitations are required to meet resource goals. Seven designated stock camps are identified in the Nelder AU outside wilderness (See Chapter 2, Table 2.23 in the 2006 SUP FEIS).

Day Rides

Day rides are constrained by several layers of control. First, for the Ansel Adams, John Muir, and Kaiser Wildernesses there are stock-at-one-time restrictions that limit the number of stock, for any activity, in these specific areas. Second, the maximum permitted stock limits provide control on the daily activities from each pack station. Although day rides are an identified need for the Dinkey Lakes Wilderness, day rides are not permitted in the Dinkey Lakes Wilderness because there is no documentation of commercial past use and there is no request for day rides at this time. Services that travel or pass through Dinkey Lakes Wilderness are not considered day rides.

Grazing Management

Grazing suitability determinations were made throughout the project area for meadows requested by the pack station operators. Generally, grazing is managed by individual meadows. An estimate of stock night capacity is assigned to each area where grazing is authorized. The specific allocations for the AA/JM Wilderness are listed in this FEIS, Appendix C, and for all other areas in the 2006 SUP FEIS, Chapter 2, Table 2.22 and 2.23. Stock entry or use will not be allowed in areas identified as critical or unsuitable.

Trail Suitability

For non-wilderness areas of the Forest and within the Kaiser Wilderness all National Forest System trails are open to commercial pack stock as well as the public. Use trails are open until specifically closed. All use trails are approved by the Forest Service before being authorized to commercial pack stations. These are listed in the FEIS, Tables 2.15, and Appendix C. A list of closed use trails is found in the FEIS, Table 2.15.

Within the Ansel Adams, John Muir and Dinkey Lakes Wildernesses system trails considered "Not Suitable for Commercial Stock" have been listed in the FEIS, and Appendix C. Commercial pack stock operators are not allowed to use system trails considered "Not Suitable for Commercial Stock."

Actions in the Ansel Adams and John Muir Wildernesses

The *2005 Pack Stock Management FEIS* in the Ansel Adams and John Muir Wildernesses ROD amended the 2001 Ansel Adams, John Muir, and Dinkey Lakes Wildernesses ROD, and contained management direction and use levels for all commercial pack station activities in these wilderness areas.

The selected alternative for this project assigns and authorizes certain uses identified in the *2005 Pack Stock Management ROD* to the seven pack stations. The *2005 Pack Stock Management ROD* identified and analyzed the appropriate use levels in the AA/JM Wildernesses, but did not assign these use levels to specific pack stations. The uses assigned and authorized in this decision are as follows:

1. Assign the quota for stock in the wilderness at one time by pack station.

2. Assign destination quotas by pack station.
3. Assign day ride destinations by pack station.
4. Assign all expense trip quotas by pack station.

These assignments are discussed under the pack station specific descriptions in the Alternative 3, and listed in 2006 SUP FEIS Appendix C.

Heritage Values

The Programmatic Agreement was signed December 21, 2006. It is titled the *Programmatic Agreement among the Pacific Southwest Region, USDA Forest Service, California State Historic Preservation Officer, Nevada State Historic Preservation Officer, & the Advisory Council on Historic Preservation Regarding the Identification, Evaluation, & Treatment of Historic Properties within the Area of Potential Effect of Pack Station Operations & One Outfitter Guide Operation on the Inyo & Sierra National Forests, California and Nevada* (PA) to comply with Section 106 for pack station and outfitter guide operations.

Rationale for the Decision

How the Decision Meets the Purpose and Need

There is a need for this action because the current Special Use Permits authorizing commercial pack stock services based on the Sierra National Forest have expired or are about to expire. Applications for reissuance have been received from the current permit holders, and there is a need to take action on these applications.

Applications for a Special Use Permit to conduct pack stock supported activities on National Forest System lands were received from seven existing permittees. Selection of Alternative 3 meets the need to take action by deciding to allow the reissuance of the seven SUPs for pack stock supported services on the Sierra National Forest, with appropriate management prescriptions that provide for protection of the resources and preservation of wilderness character.

This decision does not automatically authorize the issuance of a permit; based on Forest Service policy applicants must still meet other requirements necessary to secure a SUP. These are administrative tasks and not part of the NEPA process. Some of the key administrative requirements that must be met following this decision are:

- Financial Ability Determination (FAD)
- Insurance review
- Environmental Site Report
- Title VI review (Civil Rights)
- Fee Calculation
- Compliance Review

1. A purpose of this action is to provide high quality, dependable stock packing service as part of a wide range of recreational activities available in geographically distributed areas of the Sierra National Forest. The services offered must be consistent with the Sierra National Forest Land and Resource Management Plan (LRMP) as amended, and

the commercial Needs Assessments for the Ansel Adams, John Muir, Dinkey Lakes and Kaiser Wildernesses.

Selection of Alternative 3 meets this purpose by allowing the seven pack stations to operate on the Sierra National Forest. Five of the pack stations are in locations with relatively easy access and well distributed across the Forest. Two of the pack stations have bases on private land. The locations and number of pack stations are providing a variety of recreational services to visitors.

Consistency with the Needs Assessment for the AA/JM Wildernesses was extensively analyzed in the 2005 Pack Stock Management FEIS. The Needs Assessment clearly establishes the need for commercial packing services in the Ansel Adams and John Muir Wildernesses and identifies a range for this need. As stated in the Wilderness Act, "commercial services may be performed to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the Act." The Needs Assessment indicates that the American population's need for outfitting and guide services will be more important in the next 10-20 years to enable visitors in need to access and experience their public lands. It also indicates that demographic trends point to the likelihood that in the future, more people will need these services. The analysis must consider such future needs, and not be entirely focused on the past or present situation. While the selected alternative does not meet the full level of public need as displayed in the Needs Assessment, it does allow for a reasonable level of service that is within the low end of this range. I believe the selected alternative contains the combination of control mechanisms that will preserve the wilderness character of the area, and still allow for an adequate range of use for commercial packing services.

Consistency with the Needs Assessment for the Kaiser Wilderness was analyzed in this EIS. The Needs Assessment establishes the need for commercial stock packing services in the Kaiser Wilderness. The Needs Assessment indicates that the types of services currently provided by pack stock outfitters are consistent with the intent of the Wilderness Act. There is a public need for commercial pack stock services in this wilderness. The effects from other management actions on the Sierra National Forest, unmet needs, and demographic trends, will lead to greater public need for these services in the future. The Needs Assessment found that, to meet these objectives, commercial use levels equivalent to the current allocations to commercial pack stock outfitters should be continued.

2. A purpose is to develop management direction that allows for a business and operational climate that encourages long term and predictable stability with respect to commercial pack stock operations on the Sierra National Forest.

This decision allows for the issuance of seven Special Use Permits for pack station operations on the Sierra National Forest.

Selection of Alternative 3 meets this purpose by implementing destination quotas, stock-at-one-time limits, and designated stock camps in the Kaiser and Dinkey Lakes Wildernesses, and MWSR. This alternative sets forth grazing limits, prescribes management actions related to facilities, sets maximum permitted stock limits and defines the permitted trail system. In addition, this decision implements portions of the 2005 Pack Stock Management FEIS. It assigns destination quotas, stock-at-one-time limits, and all expense trip quotas to individual

pack stations for the AA/JM Wildernesses. Each pack station knows exactly how much use they have allocated, and where that use may occur. They also have clear direction on management action required at their facilities. The monitoring prescribed and the "Toolbox" approach to adaptive management also helps define the parameters under which these permittees may operate and when and how changes might occur.

I believe the management direction not only creates a predictable environment, but it provides a sufficient level of authorization so that each permittee has a fair chance of remaining in business. This in turn creates an operational climate that encourages long term planning and stability to provide high quality, dependable packing service.

I anticipate, based on Forest Service policy that 20 year term Resort Special Use Permits will be authorized provided the applicants meet all the appropriate requirements. This determination is based on a preliminary administrative analysis of the applications and supporting documentation. Forest Service policy (FSH 2709.11 Chapter 10, Exhibit 3; FSH 2711.3 Part 4) states that term permits should be limited to a 20 year term, however in special situations the Regional Forester may approve terms up to 30 years, when the investment is over one million dollars. A review of the Gross Fixed Assets (GFA) of each of the pack stations indicates that none of the seven will qualify for a 30 year term.

Based on the numerous comments regarding the type and term of the permits received from the public in response to the DEIS it is clear that there is a lack of understanding of Forest Service policy and permit administration. A SUP with a 20 year term does not mean that there will be no management or operational changes over the life of the permit. It is intended that the pack station operations will be monitored based on the management direction presented in this ROD. Adjustments to the operation are made, as needed, and documented in the Annual Operating Plan (AOP). The Monitoring Plan in Appendix A describes the typical range of monitoring activities and presents a "Toolbox" to guide the Authorized Officer in adapting to changing conditions.

> ***3. A purpose of this action is to respond to the Court Order issued in 2001 that required that the Forest Service evaluate the impacts of commercial pack stock operations on the AA/JM Wilderness prior to issuing permits for these operations. The court ordered that, "The Forest Service shall complete the NEPA process analyzing the cumulative effects of pack stock operation [in the Ansel Adams and John Muir Wildernesses] no later than December 31, 2005… No later than December 31, 2006 the Forest Service must complete site-specific environmental analysis under NEPA for each permittee."***

This decision incorporates and implements direction from the 2005 Pack Stock Management FEIS/ROD that analyzed cumulative effects of pack stock operations.

The cumulative effects analysis was completed in December 2005 (2005 Pack Stock Management FEIS/ROD). The decisions being made in this 2006 FEIS respond to the court's order to re-issue the SUPs, tiering to the 2005 decision so as to reduce redundancy and focus on the issues now ripe for decision – whether or not to issue new permits to operators. In doing so we are clearly within the guidance provided by CEQ regulations – "*Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of*

the same issues and to focus on the actual issues ripe for decision at each level of environmental review".

The 2005 Pack Stock Management FEIS, which this document tiers to, considered the four topics required by the courts:

- Limits on numbers of stock animals used in conjunction with commercial operators
  - The selected alternative uses a stock at one time in the wilderness limitation to provide a temporal control for commercial pack stock use.
- Limits on group size;
  - Limits on group size were considered and were set at the pre-injunctive relief party size of 15 persons and 25 stock. Lower limits were considered in non-selected alternatives. Lower group sizes were set at specific destinations.
- Trail suitability for various use types;
  - The selected alternative approved a limited number of visible use trails that typically have minimal resource concerns and are suitable for commercial stock use. It also designated 89 miles of trails as "not suitable for commercial stock".
- Designation of campsites for use by commercial pack stations.
  - The selected alternative requires that designated sites be used whenever commercial stock are held overnight in the AA/JM Wilderness areas.

During analysis of use in the AA/JM Wildernesses, an interdisciplinary team (IDT) visited hundreds of specific locations and analyzed the effects of the decision at a site-specific scale.

The Forest has completed this 2006 SUP FEIS to analyze actions for every pack station, rather than complete a separate EIS for each pack station. We used this approach because we wanted to portray the cumulative effects of use by all pack stations based on the Sierra National Forest. We chose to complete an EIS rather than an Environmental Analysis to comply with NEPA, and to meet the intent of recent 9th Circuit Court of Appeals decisions.

Since 2002, the pack stations have been operating under court ordered injunctive relief. The injunctive relief required that the pack stations reduce their service days by 20% relative to pre-injunction levels, but did not prescribe site-specific actions to manage the effects of commercial pack stock use. Further, it applied only to the AA/JM Wildernesses. This decision, with its implementation of the 2005 Pack Stock Management FEIS/ROD, provides site specific direction with destination management in the AA/JM Wildernesses. The current condition and possible management solutions for both the AA/JM Wildernesses and all other areas of the Forest were analyzed by an IDT, and the resulting decisions were found to be appropriate solutions for on-the-ground impacts. The analysis was completed by wilderness and other resource experts, who helped generate the chosen alternative based on extensive site visits.

The injunctive relief has had the effect of reducing the amount of use for commercial pack station activities. The Forest collected extensive data and develop site-specific management techniques to address resources issues in wilderness and non-wilderness areas. The court asked the Forest to look at the effects of all pack station use at the same time, and in doing so, we were able to develop a comprehensive management plan. The court ordered injunctive relief sought to address resource issues in the AA/JM Wilderness with an across-the-board reduction of use. The Forest will be able to implement site specific management in both the

AA/JM Wildernesses and the rest of the Sierra National Forest with implementation of this decision.

Information used for development of the alternatives in this EIS came from extensive site visits by an interdisciplinary team to most of the areas regularly used by commercial pack stations. The IDT visited all of the pack station facilities, pastures, and most locations where regular overnight or day use occurs.

> ***4. A purpose of this action is to provide for maintaining, or progressing towards, desired conditions for vegetation, soil, water, wildlife habitat, heritage resources, social experience, and wilderness character as identified in the Forest LRMP, as amended.***

Selection of Alternative 3 will meet this purpose because it will maintain or improve resource conditions, including social experience and wilderness character. In locations where there is potential for unacceptable resource effects, environmental protection measures will be implemented to prevent such impacts (See Chapter 2 in the 2006 SUP FEIS).

To prevent resource damage, use is highly controlled in all wilderness areas and the MWSR. In the non-wilderness areas, few existing resource concerns were found through field visits by an interdisciplinary team. In those areas with some resource concerns, management actions were developed to allow improved condition. The specific management actions prescribed will help improve conditions for water, soil, and vegetation to levels that meet standards.

Since 2002, the pack stations have been under court ordered injunctive relief, which has applied mainly to the AA/JM Wildernesses. Implementation of this decision, will allow the Forest to completely implement direction from the 2001 AA/JM and Dinkey Lakes Wilderness Plan, as well as the 2005 Pack Stock Management FEIS. With implementation of these three decisions, impacts will be addressed site-specifically. The injunctive relief was a stop gap solution, developed to rapidly address one aspect that was leading to impacts in the AA/JM Wildernesses, which was use levels. This decision, with incorporation of the 2001 and 2005 plans, may allow for higher levels of use than allowed under the injunctive relief. However, use levels are just one aspect of management. These plans address specific impacts, and site-specific management to address those impacts.

Our primary concern is resource impacts, including the wilderness resource. While this decision allows for commercial pack stock use to occur, it does not do so at the expense of long-term resource conditions. There are unavoidable resource effects from allowing any use of National Forest System land. The FEIS acknowledges and analyzes those effects, and this decision implements management actions to avoid any unacceptable negative effects.

Thirty-seven of 60 comments suggested that, by allowing long term permits (i.e. 20 years), the Forest would not review the pack stations' operations or the resource effects of those operations, for the duration of the permit. These commenters assumed that changes to operations will not be made, even if resource conditions warrant a change. This is untrue. Each pack station has an Annual Operating Plan, which is revised and approved every year before the operating season. The decision maker or authorized officer can make changes in pack station operations to respond to resource changes in that AOP. The changes can be

permanent or temporary, depending on need. If conditions warrant a change in operations, this can occur at any time. The role of a long term permit is to provide stability for the pack station, so they know that they will be allowed to operate for up to 20 years, with basic services and facilities known. It allows activities to be added during that period with proper analysis, as well as operations to be adjusted if resource conditions require a change. Further, this decision is accompanied by a monitoring and adaptive management strategy. This strategy uses a "Toolbox" to make changes as needed. The decision includes an understanding that operations will adapt to changing conditions.

Alternative 3 authorizes commercial services to the "extent necessary" for activities which are proper for realizing the recreational and other purposes of the Ansel Adams, John Muir, Dinkey Lakes and Kaiser Wildernesses. This decision issues the permits that implement the management and remediation that was included in the 2005 Pack Stock Management FEIS. This remediation was ordered by the court, and the Forest is confident that the management actions prescribed in this decision adequately remediate resource effects in the AA/JM Wilderness. In the Kaiser and Dinkey Lakes Wildernesses, this decision implements a site specific destination management strategy similar to the actions prescribed in the AA/JM and despite any minor negative effects wilderness character will be preserved.

The following is a brief description of the resource effects expected under the selected alternative (See also FEIS, Ch. 2, 2.24 Effects Summary):

- **Aquatic Species –** It is expected that no effect will occur on the Lahontan cutthroat trout. Mountain yellow-legged frog, Relictual slender salamander, and the Yosemite toad may be affected because the species or habitat may be disturbed. The project level habitat impacts will not alter or contribute to existing forest-wide impacts for aquatic management indicator species.
- **Botany** – There would be a slight reduction in potential impacts within the Dinkey Lakes and Kaiser Wildernesses and the MWSR for rare plants, fens, and weeds.
- **Grazing –** Localized minor adverse effects to vegetation, soils and hydrologic function may result from grazing activities; however, persistent effects are not expected.
- **Economics** – Direct economic contribution of labor income and employment would be similar to the current situation.
- **Heritage** – Regulated destination management zones and designated stock camps benefit heritage resources since use is regulated to a set level; prohibits overflow impact to adjacent sensitive heritage resources and moves impacting activities out of heritage sites.
- **Operations** – Institution of regulated destination management zones and designated stock camps would result in little change to pack station operations.
- **Recreation** – The range of recreational opportunities would be retained. Special populations that require the services of pack stock would continue to be served.
- **Trails** – There would be no expected change in system trail stability, as use patterns of commercial stock would not be expected to change. There would be an expected improvement to stability, accompanied by long-term naturalization, of use trails that were formerly used by commercial stock that would now be prohibited.
- **Watershed** – Soils, water quality, hydrology and geomorphology will be affected in localized areas, however, destination zones and designated stock camps would create a close tie between permitted activities and resource conditions and limit these effects.

Attainment of Riparian Conservation Objectives will not be limited and there will be no cumulative watershed effects.

- **Wilderness** – The overall impact to wilderness character in the Kaiser and Dinkey Lakes Wilderness would be protected and maintained to the same level of integrity compared to wilderness character at the time of designation. This is due to the balance to opportunities for primitive recreation and their minimal impacts to solitude in the solitude/unconfined quality of wilderness character. Thus, positive improvements are based on the distribution of people through restrictions to overnight commercial stock camps to designated sites, and by restricting spot and dunnage drops to destination zones.
- **Wildlife** – It is expected that there is no effect to the Bald eagle, Peregrine falcon, Wolverine, Sierra Nevada red fox, Townsend's big eared bat and Pallid bat because the species and/or habitat would not be disturbed. The Northern goshawk, California spotted owl, fisher, marten, willow flycatcher and great gray owl may be affected because there may be minor effects such as short term noise disturbance. The project level habitat impacts will not alter or contribute to existing forest-wide impacts for terrestrial management indicator species.

How the Decision Responds to Public Input

Throughout the development of the Final EIS and Alternatives 2 and 3, we considered public input in developing a scientifically credible, resource sustainable, and legally sufficient plan. In my judgment, the decision I am making will effectively meet legal requirements and protect resources.

A Notice of Intent to prepare an Environmental Impact Statement for the Commercial Pack Station and Pack Stock Outfitter/Guide Permit Issuance project was published in the Federal Register on August 9, 2005. The notice requested that comments on the proposed action be received by September 30, 2005**.** A copy of the Proposed Action was sent to approximately sixty interested parties, and posted on the Sierra National Forest website. Both written and email comments were received. Approximately sixty comments on the proposed action were received.

Working with the interdisciplinary team I developed a list of issues using comments received on the Proposed Action from public organizations, individuals, other agencies, and (affected) tribes. Significant issues which directly influenced the initiation, development, and technical design of the project; are disclosed in the analysis; and were used to develop alternatives to the proposed action.

On March 24, 2006, the Draft EIS (DEIS) Notice of Availability was published in the Federal Register. The document was placed on the Sierra National Forest website and was mailed to interested parties. One public meeting was held on May 2, 2006 in Clovis, California. Two people attended the meeting. The comment period closed May 15, 2006. Comments were received on the DEIS from 182 individuals, groups and/or agencies. Over 95% were generated by an organized response campaign. The Forest Service response to the comments is in Appendix F of the 2006 SUP FEIS.

There was less public interest in this project than in the 2005 Pack Stock Management FEIS. Over 95% of the individual letters contained comments identical or very similar to a form letter, usually with individual experiences included. Few of the individual letters contained unique comments.

Many of the comments we received both to the scoping document and the DEIS were related to use in the AA/JM Wildernesses. Despite our efforts to explain the scope of each document (2005 Pack Stock Management FEIS ROD pg. 41, 2006 Special Use Permit DEIS pg. 1-6), many comments attempted to re-open the decisions from the 2005 Pack Stock Management FEIS. Because the management strategies for the AA/JM Wildernesses were determined in the 2005 Pack Stock Management ROD, comments about use in the AA/JM Wildernesses were not useful for this document. This includes any comments about AA/JM Wildernesses "Not suitable for commercial stock" trail designations, destination quotas, stock in the Wildernesses at one time, designated campsites, day rides, or other AA/JM Wildernesses specific topics. Many comments also focused on the disapproval of pack stock in wilderness or front country areas. These comments were useful for determining the public's feelings about the issue, and the Forest responded to these opinions to help the public understand the Forests' process and rationale. However, only substantive comments specific to elements of the proposed actions were used for forming analysis and alternatives.

Responses to our DEIS led us to reconsider and enhance a number of elements of the analysis. For example, between the Draft and Final EIS, we developed mitigations to address public concerns about resources. We also collected some additional data and better explained management actions throughout the document to improve the information used for alternative refinement.

Many comments expressed a concern over the type and term of the SUPs. There was concern expressed that the Forest Service would be locked into management prescriptions for long terms, and would not alter any aspect of management over the life of the permit if resource conditions warranted a change. This is untrue under SUP administration, where operating plans are re-drafted annually, and management prescriptions and facilities are altered when conditions warrant. The type and term of the permits is based on Forest Service policy and are an administrative decision. The decisions presented in the ROD will be translated into appropriate terms and conditions in the SUP regardless of the type of permit. The Forest also used public input to develop a monitoring strategy and "toolbox" for creation of an adaptive management plan. This adaptive management plan shows how the Forest will be accountable for responding to resource concerns during the permit term.

Description of Alternatives Considered in Detail

Table 1.3: Summary of Alternatives

Topic	Alternative 1 No Action No permit	Alternative 2 Proposed Action	Alternative 3 Destination Management
Services	No services allowed	Services provided similar to current operations.	Same as Alt. 2

Topic	Alternative 1 No Action No permit	Alternative 2 Proposed Action	Alternative 3 Destination Management
Facilities	All facilities removed	Existing facilities remain	Same as Alt. 2
Use in AA/JM (includes all operations)	No use	Follows 2005 Pack Stock Management FEIS	Same as Alt. 2
Use Allocations in Kaiser and Dinkey Lakes Wilderness and MWSR	No use	Based on service days, daily trailhead quotas (wilderness only), and maximum stock permitted	Based on destination quotas, stock at one time limits, and designated stock camps
Use Allocation in non-wilderness areas	No use	Based on maximum stock permitted. Overnight campsite management for YTPS identified.	Same as Alt. 2
Grazing	No grazing	Suitability determined for grazing areas and stock nights allocated.	Same as Alt. 2
Noxious Weed Management	Some weed control and revegetation would be associated with removal of facilities	Requires a noxious weed management plan and use of certified weed-free feed once California program is in place.	Same as Alt. 2
Trail Suitability	No trail use	Identifies System Trails and use trails where commercial stock would be prohibited	Same as Alt. 2

Alternative 1

Alternative 1 (No Action) proposes to **not** authorize existing commercial pack stock services or facilities. Those facilities maintained for these activities would be removed from National Forest System land. In this alternative the Dinkey Lakes Wilderness direction for trails would revert to the guidelines contained in the 2001 Ansel Adams, John Muir, and Dinkey Lakes Wildernesses Plan: Appendix C.

Alternative 2

Alternative 2 (Initial Proposed Action) proposes to reissue the existing permits with service and use levels that meet desired resource and social conditions. Use in the Kaiser and Dinkey Lakes Wildernesses would continue under existing trailhead quotas and service days. This alternative proposes to establish a trail management plan for the Dinkey Lakes Wilderness.

Alternative 3

Alternative 3 (Destination Management) proposes to reissue the existing permits as in Alternative 2 with service and use levels that meet desired resource and social conditions. However destination quotas are applied for use in the Dinkey Lakes Wilderness, Kaiser Wilderness and MWSR. This alternative also proposes to establish a trail management plan for the Dinkey Lakes Wilderness.

Alternatives considered but not analyzed in detail

Federal agencies are required by NEPA to rigorously explore and objectively evaluate all reasonable alternatives that meet the purpose and need, and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.14). Public comments received in response to the DEIS provided suggestions for alternative methods for achieving the purpose and need. Some of these suggestions may have been outside the scope of responding to applications for commercial pack stock services and developing a trail plan for the Dinkey Lakes Wilderness, duplicative of the alternatives considered in detail, or determined to be components that would cause unnecessary environmental harm. Therefore, a number of alternatives were considered, but dismissed from detailed consideration.

Some of the concepts that were considered are listed below. A full rationale for not analyzing these in detail is documented in the FEIS, Chapter 2.

- Type of permit (resort vs. outfitter/guide)
- Term of permit (years permit is issued)
- Revisiting decisions made in the 2005 Pack Stock Management FEIS for the Ansel Adams and John Muir
- Reduce the number of maximum stock permitted
- Reduce the number of permits issued and/or the operating areas
- Remove or relocate pack stations and pastures
- Reduce the use allocations in the Dinkey Lakes and Kaiser Wildernesses and non-wilderness Forest areas.

Environmentally Preferred Alternative

CEQ regulations for implementing the NEPA require that the ROD specify "the alternative or alternatives which were considered to be environmentally preferable" (40 CFR 1505.2(b)). According to the CEQs 40 Most Asked Questions concerning NEPA, this direction has been generally interpreted to be "the alternative that will promote the national environmental policy as expressed in NEPA's Section 101."

Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which "best protects, preserves, and enhances historic, cultural, and natural resources." Section 101 of the National Environmental Policy Act states that:

…it is the continuing responsibility of the Federal Government to …

> (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

(2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
(3) attain the widest range of beneficial uses of the environment without degradations, risk to health or safety, or other undesirable and unintended consequences;
(4) preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment which supports diversity and variety of individual choice;
(5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
(6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative 1 "causes the least damage to the biological and physical environment." Removing all pack station operations from the Sierra National Forest (including all wilderness areas) does eliminate a source of impact on the environment. However, Alternative 1 is not the environmentally preferred alternative if the human environment, including historic and cultural resources is considered. NEPA directs federal agencies to consider the effects of federal actions on not only the physical and natural environment, but also the human and social environment. Alternative 1 does not meet the federal government's responsibility #3 above to "attain the widest range of beneficial uses of the environment without degradations, risk to health or safety, or other undesirable and unintended consequences"#4 above to "preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment which supports diversity and variety of individual choice." As discussed in the Final EIS, Alternative 1 will severely limit the ability of a certain percentage of the public to access and enjoy the Sierra National Forest, including wilderness areas analyzed in this project. Commercial packing in the Sierra Nevada has a long history of providing access for the public and is recognized as an important recreational opportunity.

Considering all six of the definitions for "environmentally preferable", Alternative 3 is the environmentally preferred alternative. It strikes a balance between non-human and human resources. First, when more people have the opportunity to have a positive recreational experience on the Forest, they are more likely to support public land protection. Alternative 3 attains the widest range of beneficial uses of the environment without unacceptable degradation. While there will be some resource effects with implementation of this decision, as with allowance of any activity on Forest land, the effects will be within acceptable limits. This decision allows the greatest number of people to share in a wilderness or non-wilderness, unique recreational experience while still preserving environmental quality and wilderness character. Although Alternative 2 would serve a similar number of people, I believe that the site specific destination management approach of Alternative 3 better protects the resources and wilderness character.

Relationship of Management Direction to Existing Plans

This decision is consistent with the current LRMP's for the Inyo and Sierra National Forests as amended by the 2004 Sierra Nevada Forest Plan amendment, the 2001 Wilderness Plan and the 2005 Pack Stock Management FEIS.

Relationship to State and Local Plans and Proposals

I have reviewed this decision and have determined that it is consistent with tribal, state and local plans.

Relationship to Other Lands

The influences of activities on lands administered by the the National Park Service were considered in the assessment of cumulative impacts in the FEIS. This decision does not adopt new management direction for those federal lands. Likewise, this decision does not establish direction or regulation for state, tribal, or private lands.

Monitoring and Mitigation

Mitigation Measures Adopted

Mitigation measures are an integral part of the management direction in Alternative 3. Mitigation measures are adopted from the 2005 Pack Stock Management FEIS/ROD for the AA/JM in this document. It is incorporated by reference all measures as listed in Appendix C of the 2006 SUP FEIS for the AA/JM and will be adopted through the monitoring toolbox as shown in Appendix A (Table 1.7) in this document. Singularly and collectively, they avoid, rectify, reduce, or eliminate potential adverse environmental impacts of pack stock management activities. Chiquito Creek Trail 23E01 will be rerouted within three years. Other significant mitigation measures are included in the *Programmatic Agreement among the Pacific Southwest Region, USDA Forest Service, California State Historic Preservation Officer, Nevada State Historic Preservation Officer, & the Advisory Council on Historic Preservation, Regarding the Identification, Evaluation, & Treatment of Historic Properties within the Area of Potential Effect of Pack Station and Operations and One Outfitter Guide Operation on the Inyo & Sierra National Forests, California and Nevada*.

Environmental Protection Measures

Any mitigation measures analyzed and adopted in the 2005 Pack Stock Management FEIS will be adopted in this decision. It is summarized in Appendix C of the 2006 SUP FEIS. The following environmental protection measures will be implemented as listed in the alternative for each pack station:

CPO

- Protect the moss species, *Meesia triquetra (a Forest Service sensitive species)* and its fen habitat in the northern finger of the meadow (e.g. by building an exclosure if necessary). If needed, the permit will be issued contingent upon an approved protection plan provided by the permittee.
- Avoid traveling through the lens-podded hoary cress (*Cardaria chalepensis* - a State B-rated noxious weed) infestation near the station along Dinkey Creek Road.
- Avoid traveling through the isolated moist meadow at the Woodchuck Spike Station (WIS) (BMP 7-3, Protection of Wetlands).

D&F

- Apply appropriate erosion control measures at the D&F Main Pack Station – Base Camp (also called Deer Creek Headquarters) and Badger Flat spike station (HNE) to prevent sediment and manure from reaching adjacent streams and meadows (BMP 2-28 Surface Erosion Control at Facility Sites, BMP 4-9 Protection of Water Quality within Developed and Dispersed Recreation Sites). Any seed or mulch would be pre-approved by the Forest Service, and must adhere to the Region 5 Native Plant Policy (FSH 2609.25 Chapter 50).
- Remove the foxglove (*Digitalis purpurea*) that is being cultivated at the Deer Creek Headquarters office (this is an invasive non-native plant). The Forest Service would remove the foxglove infestation along the nearby stream.
- Authorize stock use within ¼ mile of Huntington Lake on trail 25E43.
- Authorize use for spot and dunnage trips to drop clients off within ¼ mile of Walling Lake in the Kaiser Wilderness when access trail (KAI02) is repaired.
- Authorize stock access within ¼ mile of Jewell and Bill Lakes in the Kaiser Wilderness for spot and dunnage trips to drop clients off only.

Two hour loop, Kaiser Wilderness/non-wilderness

- On the 26E64 section of the two-hour loop trail restrict use to primary trail and prohibit use on parallel trails.

HSPS

- Manually remove the common mullein (*Verbascum thapsus,* a non-native weed) infestation at the Florence Lake Spike Station annually until eradicated.
- At the Florence Lake spike station (FLO), move the hitching rail away from the stream, to the north side of the loading area (BMP 4-9 Protection of Water Quality within Developed and Dispersed Recreation Sites).
- Authorize the existing water systems at the main pack station near Edison Lake (EDI) and at the spike station at Florence Lake (FLO).

LVPS

- Any mitigation measures analyzed and adopted in the 2005 Pack Stock Management FEIS will be adopted in this decision. It is summarized in Appendix C of the 2006 SUP FEIS.

MTR

- Any mitigation measures analyzed and adopted in the 2005 Pack Stock Management FEIS will be adopted in this decision. It is summarized in Appendix C of the 2006 SUP FEIS.

MPS

- Authorize MPS to utilize and maintain the Soldier Meadow (CLO) pasture and fence. Forest Service would monitor the sensitive plant, *Trifolium bolanderi*, in Soldier Meadow to determine if grazing practices should be adjusted. (See Table 2.22 & 2.23)

- Modify the MPS headquarters corral (CLO) so there is a 100 foot buffer between corral and Miller Creek to prevent sediment and manure from reaching the adjacent stream

(BMP 4-9 Protection of Water Quality within Developed and Dispersed Recreation Sites). Utilize non-ground disturbing construction methods to protect sensitive resources.

YTPS

- Jackson Road headquarters (NED):
- Remove common mullein from the headquarters site (especially in front of the office at the entrance from Jackson Road).

Approve subject to review and acceptance of submitted construction plans:

- Six 12'X16' above-ground buildings for staff housing built to Mariposa County code at the Jackson Rd. headquarters site.
- One above-ground building for saddle storage at the Jackson Rd. headquarters site.
- Above-ground cement pad(s) or other soil stabilizing mechanism in the saddling paddock at the Jackson Rd. headquarters site.

- Do not approve a new staff building (kitchen, lounge, toilet, and utilities) on north side of Jackson Road (at the headquarters) at this time. This project can be proposed at a future date.

Monitoring and Evaluation

The Forest Service intends to implement the monitoring plans (Appendix A) set forth in this decision and in the 2005 Pack Stock Management EIS and ROD. However, the plans are quite ambitious, and there is the possibility that in the future there will be insufficient funds to fully implement the plan, or that regional and national priorities will change. These are matters that I, as a current decision maker, cannot control. Therefore, while I hope and intend that the monitoring plans set forth in these decisions will be fully implemented, the prior caveats are necessary.

Another important point relative to the monitoring plans is that implementation of all or part of the plans is not a precondition to commercial pack stock operations. That is, the commercial operations approved by this and the 2005 decisions are not contingent upon the implementation of the monitoring plans. All of the environmental impacts displayed in the EISs are based on the amount of authorized pack stock operations. Those impacts are not based on the assumption that particular monitoring requirements will be carried out. Therefore, the monitoring plans are not mitigation measures intended to reduce environmental consequences; they are elements of an adaptive management scheme.

Finally, while the adaptive management approach is an important part of these decisions, its success is not dependent on perfect adherence to the monitoring plans. The purpose of the monitoring plans is to gain information and adjust practices based on that information. This adaptive management approach can be successful with varying levels of monitoring, and the FS may be able to make the necessary adjustments to operations even if it has not fulfilled every aspect of the monitoring plan. Furthermore, it is entirely possible that with or without monitoring, no significant adjustments will be necessary in pack stock operations due to the

cautious approach adopted in these decisions and the rigorous analysis supporting the decisions.

As described in the rationale, adaptive management and monitoring is integral to this decision. Actions such as assigning destination quotas in the Kaiser and Dinkey Lakes Wildernesses, must be monitored and evaluated for effectiveness. The monitoring plan identifies the priorities for monitoring based on needs, risks and uncertainties of certain outcomes. The monitoring plan for the AA/JM Wilderness is included in the 2005 Pack Stock Management FEIS/ROD, and is incorporated by reference here. It includes priority areas, timing, and methods for monitoring within the AA/JM Wildernesses. The knowledge gained from monitoring the project activities is necessary for management of future pack stock operations within all areas of the Sierra National Forest.

Integral to the success of adaptive management is the site-specific and accurate reporting of commercial pack stock use. An emphasis will be placed on adaptive management to be able to better understand the relationship between pack stock use and impacts. Over time, I believe that we will refine our understanding of the effects of certain management actions, and can inform future management by critical evaluations of these actions.

Findings Required by Other Laws

The Forest Service manages the Sierra National Forest in conformance with many federal laws. In this section some of the more relevant laws pertinent to this decision are discussed.

Wilderness Act

The portions of the project area subject to the Wilderness Act are the Kaiser and Dinkey Lakes Wildernesses. The Wilderness Act (Public Law 88-577) requires that wilderness character be preserved. This section documents my conclusion and finding that wilderness character will in fact be preserved under Alternative 3. In selecting Alternative 3, I am making the protection of wilderness values and character a higher priority than recreation and commercial activities.

When Congress passed the Wilderness Act in 1964, it recognized the wilderness areas that were set aside in the Act, as well as future acts, were not "pure" wilderness. This recognition is codified in Section 2(c) when the Act defines wilderness as:

> A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent human improvements of human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with man's imprint substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres or sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic or historical value.

By using phrases such as "generally appears...", and "substantially unnoticeable," Congress recognized that they were setting aside lands that had been used and showed the imprint of humans, but nonetheless were lands that, "retained their primeval character and influence,..." The Eastern Wilderness Areas Act of 1975 further drove this point home by designating 15

wilderness areas and 17 wilderness study areas in the eastern United States, many of which had been formerly logged or otherwise heavily used by humans. Congress has recognized that wilderness areas are not "pure"; they can be substantially restored or on their way to recovery and still meet the definition of wilderness under the Wilderness Act. The Forest Service has also recognized this fact by stating in its regulations (FSM 2320.6) that, "The Wilderness Act defines wilderness at some point below absolute wilderness." On National Forest System lands, once a wilderness is designated the agency has a responsibility to preserve, if not improve, the current state of wilderness character. Forest Service Manual section 2320.6 states, "The goal of wilderness management is to identify these influences (impacts to wilderness character), define their causes, remedy them, and close the gap between the attainable level of purity and the level that exists on each wilderness." It also states in the same section that the Forest Service should, "Manage wilderness towards attaining the highest level of purity in wilderness within legal constraints."

Therefore, when evaluating the environmental consequences of these alternatives, this analysis compares the effects of each alternative to the current condition of wilderness character, not to "pure" wilderness character. This comparison allows us to maintain a non-degradation policy toward wilderness character, and allows us to determine if we are in fact, "closing the gap between the attainable level of purity and the level that [currently] exists on each wilderness." If we were to analyze the effects of any action (including those not within the scope of this analysis) in wilderness as compared to "pure" wilderness, then any action would be a violation of agency regulations because every action that would allow for any kind of human impact (including any kind of visitor use) would have an adverse impact to wilderness character and would violate the Forest Service's non-degradation policy. Furthermore, this comparison would not align with the intent of Congress, which clearly intended to allow for the "use and enjoyment" (the Wilderness Act, Public Law 94-577) of wilderness areas, which inherently means that some humans impacts are acceptable, so long as the level of the impacts are below a certain threshold and wilderness character is not being degraded below current conditions.

Public Law 94-557 of 1976 established the Kaiser Wilderness without traditional administrative or legislative hearings. In the 1910's, teens and 20's, SCE maintained several pack stock camps adjacent to the area known as Kaiser Wilderness. In the 1930's there was the Lake Hotel Company which included 45 head of stock, 30 riding saddles, 42 pack outfits and operated until 1945. In 1954 the pack station near Billy Creek was bought by what is currently the D & F Pack Station. At the time of designation there were 130 head of stock providing commercial services. Currently, D & F pack station is authorized 60 head of stock.

The California Wilderness Act of 1984 (Public Law 98-425) designated Dinkey Lakes as Wilderness "*…provided, That within the Dinkey Lakes Wilderness the Secretary of Agriculture shall permit nonmotorized dispersed recreation to continue at a level not less than the level of use which occurred during calendar year 1979;"* . There were two pack stations operating in the Dinkey Lakes area totaling over 200 head of stock at the time of designation. Currently, Clyde Pack Station and High Sierra Pack Station operate totaling 120 head of stock. At the time of designation the Dinkey Lakes Wilderness was described, "…with past overuse by livestock represented in erosion of meadows, check dams are bringing area back." Other comments state, "….Trails were created in the late 1800's and early 1900's by sheepmen and cattlemen and most have excessive grades and poor locations which leads to erosion problems. Around the lakes vegetation is cut, trees are cut and marked with axes, soil is compacted and or

worn away from tree roots." The evaluation goes on to say, "…Litter is all over, most lakes have more than one group camped at one time." However, "users for the most part find the area natural but at times are impacted." The overall rating indicates "experiences are very high overall." The composite wilderness attributes score (evaluating natural integrity, apparent naturalness, solitude opportunity, and primitive recreation opportunity) was 21.

In Chapter 3 of the FEIS, four factors or qualities of wilderness character were used to assess the effects of each alternative on the wilderness character of the Kaiser and Dinkey Lakes Wildernesses. These four qualities were defined by Landres et al. (2005) and come directly from the language in the Wilderness Act (Sec. 2(c)). The four qualities of wilderness character can be affected differently by the same action, thus, a composite of all four qualities provide an overall assessment of affect. It is the responsibility of the managing agency to assess these factors in relation to each other, and to balance these qualities in order to best preserve wilderness character.

See the 2006 SUP FEIS (pg. 3-15 to 3-22) for a lengthy discussion of each of the four factors that represent the essence of wilderness character, which are briefly discussed here. In this document, the four factors are analyzed in relation to the selected alternative for the Kaiser and Dinkey Lakes Wildernesses only.

Compliance of commercial pack stock use in the AA/JM Wilderness with the Wilderness Act was analyzed in the 2005 Pack Stock Management FEIS ROD, and is incorporated here by reference. It was determined that the commercial pack stock use in the AA/JM Wildernesses under the selected alternative will preserve wilderness character.

Untrammeled Quality

This quality expresses that wilderness is essentially unhindered and free from modern human control or manipulation. Examples of trammeling include dams that impede natural flood cycles, animals or plants that are transplanted or re-established, and fires that are suppressed. These types of actions are intentional and deliberate, and conspicuous in their effects on ecological processes.

As a result of this decision, there will be no effects to the untrammeled quality of wilderness character. Impacts to this quality are generally the result of major structural installations (such as dams) or ecosystem-wide management actions (such as fire suppression). Since there are no actions of this type proposed in Alternative 3, there is no effect.

Undeveloped Quality

This quality expresses that wilderness is essentially without permanent human improvements or modern human occupation. The physical evidence of humans and human activity should be "substantially unnoticeable." Trails and campsites, while facilitating use and enjoyment of the wilderness, can also be considered obtrusive and evidence of human influence. The "minimum necessary" philosophy directs managers to exercise restraint in order to ensure that visitors experience a primitive environment.
There will be no effect to the undeveloped quality of wilderness in the Kaiser or Dinkey Lakes Wildernesses as a result of this decision. There will be no additional campsites developed at new locations because of the requirement for commercial pack stations to drop clients within

designated destination zones and to hold stock overnight in designated stock camps. These zones were selected because they are a reflection of current use patterns, which are within desired conditions for the Kaiser and Dinkey Lakes Wildernesses.

Natural Quality

This quality expresses that wilderness ecological systems are substantially free from the effects of modern civilization. The Wilderness Act makes it very clear that wilderness areas serve as a contrast to modern civilization. They are places where "man and his own work do not dominate the landscape." The agency manages for natural processes to dominate the landscape.

The Forest Service recognizes that there are non-significant adverse impacts are present in the Dinkey and Kaiser Wildernesses, however, the management natural quality of wilderness character. These impacts are disclosed in the Physical Environment and Biological Environment sections of Chapter 3. However, when analyzing the effects of agency actions to wilderness character, the effects are compared to current condition (which is at an improved overall rating of wilderness attributes than at the time of designation), not to "pure" wilderness or a state of wilderness that is some variation from the current condition (which is at the same threshold level as at the time of designation).

There are impacts affecting soil resources, water resources, botanical resources, grazing resources, wildlife resources or aquatic resources with the continued use from commercial pack stock operations. However, while there are minimal adverse impacts to these physical and biological resources from the actions authorized in this decision, the approved commercial pack stock operations maintain an overall wilderness character composite score of 21 (the same composite score of wilderness character at the time of wilderness designation). Alternative 3 restricts commercial pack stations to use levels and use patterns that provide packing services while still protecting the wilderness character. In addition, commercial pack stock grazing will no longer be allowed in Rock Meadow. However, the meadow will still be grazed by cattle and private recreational stock. At the wilderness scale, the natural quality of wilderness character will be maintained.

There would be no change in effect to soil resources, water resources, botanical resources, grazing resources, wildlife resources, or aquatic resources compared to the wilderness character at the time of designation. The reason that there is no change to these resources is that this alternative restricts commercial pack stations to essentially the same use levels and use patterns that are currently taking place within the Kaiser and Dinkey Lakes Wildernesses, and does not allow for future changes in use levels or use patterns (e.g. camping at different destinations than currently used or increasing the number of trips to destinations that are currently used). Current use levels are below use and patterns than commercial pack stock activities at the time of designation and will maintain the integrity of wilderness character at the same threshold as 1984. One exception to this general statement will be a trend towards improving wilderness character due to grazing resources in the Dinkey Lakes Wilderness because commercial stock will no longer be allowed to graze in Rock Meadow until assessed. However, the meadow will still be grazed by cattle and recreational stock. At the wilderness scale, there will be no effect to the natural quality of wilderness character compared to the current condition.

Outstanding opportunities for solitude or a primitive and unconfined type of recreation

This quality expresses that wilderness provides outstanding opportunities for people to experience solitude or primitive and unconfined type of recreation, including the values of inspiration and physical and mental challenge.

Solitude will be protected in this alternative by the established destination quotas. No more than 40 trips are allowed into the Kaiser Wilderness and a total of 16 in the Dinkey Lakes Wilderness. In addition there are stock-at-one-time limitations for both wildernesses. These restrictions should sufficiently distribute commercial stock use in time and space to maintain a high level of solitude in both of these wildernesses.

Similar to the analysis of the natural quality of wilderness character, the effects to opportunities for solitude or a primitive and unconfined type of recreation are compared to the integrity of wilderness character at the time of designation (as stated in the 2006 SUP FEIS under current condition), not to "pure" wilderness or a state of wilderness that is some variation from the current condition. The rationale for using this analysis methodology is described above, in the paragraphs immediately under the *Wilderness Act* section of this Record of Decision. Using this methodology, there will be no net effect to opportunities for solitude or a primitive and unconfined type of recreation as a result of this decision, though there would be some effects to individual portions of this quality. There will be minimal adverse impacts to the ability for commercial pack station clients to experience opportunities for unconfined recreation because they in fact would be confined to camping within destination zones in the Kaiser and Dinkey Lakes Wildernesses (unless they decide to haul their supplies by foot to a location outside of a destination zone, which is unlikely). In the Kaiser Wilderness, 74% of all inventoried campsites will still be available to commercial clients, and in the Dinkey Lakes Wilderness, all of the campsites used by commercial packstations in recent history will still be available. There will also be minimal positive impact to opportunities for solitude for other users, because this decision will result in slightly fewer users outside of the destination zones. Considering that commercial pack station client's account for 3.4% of all overnight use in the Kaiser Wilderness and 1.9% in the Dinkey Lakes Wilderness, this positive effect will be minimal.

Effect on Wilderness Character

In this assessment, we demonstrate and support a finding of preserving wilderness character. Weighing together the four qualities of wilderness character in relationship to each other, and in relationship to the proposed level of commercial pack stock uses allowed by the selected alternative, our assessment indicates that wilderness character will be protected and therefore no change to any of the individual qualities of wilderness character, as a result of this decision.

National Environmental Policy Act (NEPA)

NEPA requires that Federal agencies prepare detailed statements on proposed actions that significantly affect the quality of the human environment. This requirement is designed to serve two major functions: 1) to provide decision makers with a detailed accounting of the likely environmental effects of a proposed action prior to its adoption; and 2) to inform the public of, and allow comment on, such efforts.

The Sierra National Forest has compiled and generated information relevant to the effects of each of the alternatives considered in the FEIS. Such information builds on the data, analysis, and public involvement set forth in the documents prior to this FEIS, and includes the 2005 Pack Stock Management EIS.

All substantive comments, written and oral, made on the DEIS have been summarized and responded to in the FEIS. Over the course of analysis, this public involvement has led to changes in the alternatives including the selected alternative.

The environmental analysis and public involvement process complies with each of the major elements of the requirements set forth by the CEQ for implementing NEPA (40 CFR 1500-1508).

First, the FEIS considered a range of reasonable alternatives.

Second, the FEIS reflects consideration of cumulative effects of the alternatives by evaluating past, present, and reasonably foreseeable future actions in the planning area. Moreover, although non-Forest System lands are outside the scope of this decision, effects from their management have been considered in the FEIS to a degree appropriate for a NEPA document of this scale.

Third, the FEIS makes use of the best available information. Application of a geographic information system (GIS) was used to evaluate spatial effects resulting from implementation of the alternatives. The best available science was used to help estimate environmental consequences as evidenced from the bibliography. All of these tools, taken collectively, constitute use of the best available information.

Additional site-specific decisions will be made on projects in compliance with NEPA, Endangered Species Act (ESA), and other environmental laws following applicable public involvement and appeal procedures.

National Forest Management Act (NFMA)

This decision conforms to the 1982 planning regulations (36 CFR 219) that implement the NFMA. These regulations were recently changed (65 FR 67513). Transition language within the new regulations permits plan revisions and amendments, such as the amendments that are part of this decision, to be completed under the 1982 regulations. Since the rest of the LRMPs will continue to fall under the 1982 regulations, and since there is some uncertainty over the implementation of the new regulations, it is our decision to adopt these amendments under the 1982 regulations.

Diversity and Viability Provisions for Fish and Wildlife

The NFMA requires the Secretary of Agriculture to "specify guidelines for land management plans developed to achieve the goals of the Renewable Resource Planning Act [RPA] which provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives" (16 U.S.C. 1604(g)(3)(B)). In accord with this diversity provision, the Secretary promulgated a regulation that provides in part: "[f]ish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area" (36 CFR 219.19, 1982 edition).

The Sierra Nevada Forest Plan Amendment (SNFPA) Record of Decision established land allocations and standards and guidelines to meet all of the diversity and viability provisions for fish and wildlife. The standards and guidelines for vegetation management do not apply to recreation and special use projects (SNFPA FSEIS pg.11), however, this decision will also provide the fish and wildlife habitat and other ecological conditions necessary to maintain well-distributed viable populations of vertebrate species in the planning area, and maintain the diversity of plants and animals. An independent analysis of the impacts of the alternative effects to TES species was conducted and the viability will be maintained.

Endangered Species Act (ESA)

Forest Service Manual Direction found in 2670.31, #3 states "through the biological evaluation process, review actions and programs authorized, funded, or carried out by the Forest Service to determine the potential effect on threatened and endangered species and species proposed for listing". The Biological Evaluation prepared for this project determined that implementation of Alternative 3 would not affect any Federally listed threatened, endangered or proposed wildlife species. Per Forest Service Manual 2670.31, #5 direction; no consultation with the U. S. Fish and Wildlife Service is required when a no effect determination is concluded in the biological evaluation process.

Consultation requirements under Section 7 of the ESA, has previously been completed with the U. S. Fish and Wildlife Service for the John Muir and Ansel Adams portion of the Analysis Area covered by the Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses EIS Record of Decision of December, 2005. The Fish and Wildlife Service under their regulatory jurisdiction reviewed the Biological Assessment (BA) for the threatened, endangered and proposed species submitted by the Inyo National Forest. The Service in a letter dated November 18, 2005 concurred with the Inyo National Forest BA determination that implementation of the selected Alternative 2-Modified "is not likely to adversely affect" the Sierra Nevada bighorn sheep.

National Historic Preservation Act (NHPA)

Compliance with Section 106 of the National Historic Preservation Act has been met for the AA/JM Wilderness through the Programmatic Agreement of 2001 for *Controlling Impacts on Historic Properties; Management of Ansel Adams, John Muir and Dinkey Lakes Wildernesses, Sierra and Inyo National Forests*. The requirements in this Programmatic Agreement have been met and the Forest is no longer working under this agreement.

In addition, the Forest has developed a Programmatic Agreement (PA) for site specific actions in the 2006 Pack Stock Management FEIS titled, *Programmatic Agreement among the Pacific Southwest Region, USDA Forest Service, California State Historic Preservation Officer, Nevada State Historic Preservation Officer, & the Advisory Council on Historic Preservation Regarding the Identification, Evaluation, and Treatment of Historic Properties within the Area of Potential Effect of Pack Station Operations & One Outfitter Guide Operation on the Inyo & Sierra National Forests, California and Nevada* (PA) to deal with Section 106 compliance for pack station and outfitter guide operations.

Tribal governments and communities have been consulted in development of the PA.

Clean Water Act

Full implementation of this decision is expected to maintain and improve water quality and satisfy all State water quality requirements. This finding is based on the standards and guidelines contained in the decision, the application of State approved Best Management Practices specifically designed to protect water quality, and the discussion of water quality and beneficial uses contained in the FEIS. Examples include: (1) designation of stock camps, (2) destination zone management, including quotas, (3) grazing strategy and (4) mitigations at pack stations to reduce sediment. Additionally, project-level analyses for activities subsequent to the decision will be required to demonstrate compliance with Clean Water Act and State water quality standards.

Flood Plains and Wetlands (Executive Orders 11988 and 11990)

These Executive Orders require Federal agencies to avoid, to the extent possible, short- and long-term effects resulting from the occupancy and modification of flood plains, and the modification or destruction of wetlands. The LRMP provides standards and guidelines for soil, water, wetlands, and riparian areas to minimize effects to flood plains and wetlands, including Best Management Practices (USDA 2000) and pack stock grazing management guidelines.

Alternative 3 incorporates adequate standards and guidelines to minimize impacts to flood plains and wetlands. This alternative will allow pack stock grazing and commercial pack stock use of trails to occur in flood plains. No activities are permitted within wetlands (wetland portions of approved grazing areas will be avoided). Monitoring and adaptive management described in Appendix A of this ROD will ensure that no permanent modifications of these features or impacts to their function will occur.

Environmental Justice (Executive Order 12898)

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires that Federal agencies make achieving environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of their programs, policies, and activities on minority populations and low-income populations. The issue of environmental justice is analyzed within the Socioeconomic section in Chapters 3 of the FEIS.

A qualitative assessment of environmental justice considerations was conducted based on the information in the FEIS described above. Our conclusion is that the risk of such disproportionate effects on minority or low-income populations from implementation of this decision would be very low.

Civil Rights

The Forest Service manual defines civil rights as “the legal rights of United States citizens to guaranteed equal protection under the law” (USDA Forest Service Manual 1730). Civil rights impact analysis for environmental or natural resource actions are a necessary part of the social impact analysis package in an environmental impact statement and are not a separate report (USDA FSH 1709.11).

The Forest Service is committed to equal treatment of all individuals and social groups in its management programs in providing services, opportunities, and jobs. Because no actual or projected violation of legal rights to equal protection under the law is foreseen for any individual or category of people, no civil rights impacts are reported in the FEIS.

How this document relates to the 2005 Pack Stock Management FEIS

This decision on the 2006 SUP FEIS closely follows a previous planning effort, the 2005 Pack Stock Management FEIS. The 2005 Pack Stock Management FEIS documented the cumulative effects of commercial pack stock operations in the Ansel Adams and John Muir Wildernesses, and determined management for a number of issues including limits on the number of animals used in conjunction with commercial operators, limits on group size, trail suitability for various uses, and designation of destinations and campsites for use by commercial pack stations. In the 2005 Pack Stock Management ROD, commercial pack station use levels in the Ansel Adams and John Muir Wildernesses was decided, but the allocation to specific operators, and the terms to be contained within individual pack station permits is determined in this decision.

The 2006 SUP FEIS project analyzes commercial pack station operations in non-wilderness areas of the Sierra National Forest as well as the Kaiser and Dinkey Lakes Wildernesses. It does not revisit the decisions made in the 2005 Pack Stock Management ROD for the Ansel Adams and John Muir Wildernesses. Unlike the Final EIS for the 2005 Pack Stock Management FEIS project which was completed as a joint effort involving both the Inyo and Sierra National Forests, the forests are issuing their own Permit Issuance EIS and decision. Decisions made in this ROD include whether to issue the permits for these operations and if so, with what terms and conditions.

Implementation Plan

The direction in this ROD will become effective after publication of the Notice of Availability in the Federal Register. All the management actions and prescriptions will be incorporated into the SUPs and/or AOPs issued to each of the authorized pack stations starting with the 2007 season.

Table 1.4: Implementation Schedule

Action	Timing
Issue Special Use Permits • Financial Ability Determination (FAD) • Insurance review • Environmental Site Report • Title VI review (Civil Rights) • Fee calculation • Complete Compliance Review	April 2007
Annual Operating Plan (AOP)	June 2007 – or prior to 1st trip of the season. Annually thereafter prior to 1st trip.
Master Development/Site Plan	As scheduled in permit

Action	Timing
Implement destination management in Kaiser and Dinkey Lakes Wildernesses, MWSR	Simultaneous with AA/JM
Implement stock at one time limits for Kaiser and Dinkey Lakes Wildernesses	Simultaneous with AA/JM
Designate stock camps in Dinkey Lakes and Kaiser Wildernesses and MWSR (12)	December 2010
Environmental Protection Measures at facilities (corrals etc)	October 2008 (within 2 seasons)

Implementation Date

If no appeals are filed within the 45-day time period, implementation of the decision may occur on, but not before, five business days from the close of the appeal filing period. When appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

Administrative Review or Appeal Opportunities

This decision is subject to appeal pursuant to 36 CFR Part 215. Only those individuals and organizations who submitted written or oral comments during the 45-day comment period (36 CFR 215.6) and otherwise meet the specific requirements of 36 CFR 215.13 have standing to appeal. Appeals must be filed within 45 days from the publication date of this notice in the Fresno Bee. Notices of appeal must meet the specific content requirements of 36 CFR 215.14. An appeal, including attachments, must be filed (regular mail, fax, e-mail, hand-delivery, express delivery, or messenger service) with the appropriate Appeal Deciding Officer (36 CFR 215.8) within 45 days following the publication date of this notice. The publication date of this notice is the exclusive means for calculating the time period to file an appeal (36 CFR 215.15) (a)). Those wishing to appeal should not rely upon dates or timeframe information provided by any other source.

The appeal must be filed with the Reviewing Officer:

Bernie Weingardt, Regional Forester
USDA Forest Service
Pacific Southwest Region
1323 Club Drive
Vallejo, Ca. 94592

The phone number is (707) 562-8737. Appeals may be submitted by FAX (707)562-9091 or by hand-delivery to the Regional Office, at the address shown above, during normal business hours (Monday-Friday 7:30 am to 4:00 pm). Electronic appeals, in acceptable [plain text (.txt), rich text 9.rtf) or Word (.doc)] formats, may be submitted to: appeals-pacificsouthwest-regional-office@fs.fed.us with Subject: Commercial Pack Stock Permit Reissuance for the SNF.

Contact Persons

For additional information concerning this decision or the Forest Service appeal process, contact:

Kim Sorini-Wilson
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Prather, California 93651
(559) 855-5355 extension 3328

Signature

/s/ *Edward C. Cole* January 30, 2007
Edward C. Cole Date
Forest Supervisor
Sierra National Forest

Record of Decision – Appendix A: Commercial Pack Stock Monitoring, Evaluation and Adaptive Management Plan

Goals and Objectives

This monitoring plan applies specifically to commercial pack stock activities in the Kaiser and Dinkey Lakes Wildernesses and non-wilderness portions of the Sierra National Forest.

This monitoring plan incorporates adaptive management to adjust to changing conditions, results of monitoring, or new information. Adaptive management is an approach to managing resources where the planning process includes recognizing the uncertainty in existing knowledge related to the resource being managed, and treats management actions as experiments or as hypotheses to be tested using monitoring specifically designed for the particular action (Williams, 1999; Healey et al., 1998; Walters 1986).

The goal of this monitoring plan is to:

1. Describe the monitoring, evaluation and adaptive management process.
2. Prioritize data collection to validate that the management actions described in Alternative 3 are being implemented; that these actions are working as designed; that changes in management occur as resource condition assessments warrant.
3. Validate that the commercial pack stock management actions are leading to, or maintaining the desired conditions for the various resources.

Data Collection Process

Protocols for all the resources and/or features subject to monitoring have been developed through the interdisciplinary team process and are documented in the Protocols section of the Project Record and the Evaluation of Commercial Pack Stock Operations Study Plan (as referenced in 2005 Pack Stock Management FEIS and ROD). Conditions at meadows, on use trails and at destinations all have designed attribute rating protocols for rapid assessment. In addition to the existing protocols, a training, recordation and documentation process is being developed for consistent future applications across the planning area.

Special Use Permit Administration

As directed by Forest Service Handbook FSH 2709.11, Forest Service permit administrators ensure compliance with the terms and conditions of the Special Use Permit and Annual Operating Plan. Compliance review of special use permit clauses (example in Appendix E of EIS) and the annually developed operating plan are done in accordance with Forest Service Handbook direction. Examples of items in a compliance review include but are not limited to: land use rental fee review, liability insurance, health and safety, customer satisfaction, facility maintenance, protection of water quality (BMPs), noxious weeds, submission of use data,

heritage resource concerns, Threatened, Endangered and Forest Service Sensitive (TES) concerns, and grazing standards and guidelines including range readiness and forage utilization. Frequency of these compliance reviews is determined by Authorizing Officers based on budget prioritization

Resource-Specific Monitoring

The purpose of Resource monitoring is to determine effects to various resources as listed below. Aquatic, botanical, grazing, heritage, watershed, and wildlife resources will be evaluated.

Specialists assessed priorities for other areas, based on resource concerns and use levels. These priorities were then combined to determine areas of multiple concerns. Through a distillation process of evaluating needs, risk factors, use levels and geographic proximity, the following areas have been determined to be the highest need for regular monitoring for effectiveness and implementation of the decision.

Table 1.5: General Resource Monitoring Locations

Objective: To monitor and provide evaluation of management actions in locations where resource concerns or risks have been identified and pack stock use is authorized. This type of monitoring will occur at the intervals displayed in specific monitoring needs which reside in the Project Record to determine if desired conditions are being met.

Analysis Unit	Aquatic Species Objective: Determine effect to species/ populations	Botanical Objective: Determine effect to species/ populations, check for new infestations of noxious weeds	Grazing Objective: Determine forage utilization and meadow ecological status	Heritage Objective: Determine effects (25% of total proposed in PA) Note: *site locations are confidential and not disclosed here*	Watershed Objective: Ensure that approved use trails are not affecting beneficial uses; determine effects to hydrologic function of meadows	Wildlife Objective: Determine effect to species/ populations
NED	1 site	2 meadows (fens)	3 meadows 1 pasture	5 sites	3 use trails	1 meadow
CLO	1 site	1 pasture	-	11 sites	-	-
EDI	-	-	-	8 sites	-	-
CHQ	1 site	-	-	0 sites	-	-
FLO	-	3 sites	-	2 sites	-	-
KAI	9 sites	-	-	2 sites	1 use trail	1meadow
HNE	4 sites	-	-	7 sites	-	-
HNW	-	-	-	1 site	-	-
COO	3 sites	-	-	5 sites	-	-
DIL	5 sites	-	-	0 sites	-	1 site
HEL	2 sites	-	-	2 sites	-	-
NEL	4 sites	-	-	0 sites	-	-

Analysis Unit	**Aquatic Species Objective: Determine effect to species/ populations**	**Botanical Objective: Determine effect to species/ populations, check for new infestations of noxious weeds**	**Grazing Objective: Determine forage utilization and meadow ecological status**	**Heritage Objective: Determine effects (25% of total proposed in PA) Note: *site locations are confidential and not disclosed here***	**Watershed Objective: Ensure that approved use trails are not affecting beneficial uses; determine effects to hydrologic function of meadows**	**Wildlife Objective: Determine effect to species/ populations**
DFC	2 sites	1 meadow	1 pasture	2 sites	2 pastures	1 meadow
TUL	-	-	-	0 sites	-	-
WIS	-	-	-	0 sites	-	-
JM/AA	As determined in 2005 Pack Stock Management FEIS					

Table 1.6: Resource Specific Monitoring Locations

Objective: To monitor and provide evaluation of management actions in locations where resource concerns or risks have been identified and pack stock use is authorized. This type of monitoring will occur at the intervals displayed in specific monitoring needs which reside in the Project Record to determine if desired conditions are being met.

Aquatic Species Monitoring

- The locations for aquatic species monitoring is based on critical areas for the Mountain yellow-legged frog, Relictual slender salamander, and the Yosemite toad within the analysis units that overlap with project activities. Critical areas would be considered as occupied meadows or lakes and nearby dispersal habitats.

- If monitoring identifies new occupied sites or if declines in population numbers or deterioration of habitat conditions occur based on project activities and are significant enough to warrant recommending additional species protection measures, the decision maker (i.e. District Ranger) would be notified and recommendations would be made for protection of the aquatic species and their habitats.

- Specifically for the Yosemite toad, monitoring would consist of:
  - Monitoring selected sites that have good breeding habitat but were unoccupied at time of the 2002 through 2004 inventory (that also occur within 0.6 miles of occupied sites) to determine if the sites are now occupied.
  - Monitoring known occupied sites in 5-year cycles to determine if the sites are still occupied, the population status (i.e. presence / absence surveys along with population life-stage counts and comparisons to prior year(s) population data) and assess the habitat quality (using protocols developed by the Region 5 Amphibian Monitoring Coordinator (i.e. extensive and intensive monitoring protocols).
  - Assessing occupied sites for recreational impacts associated with pack stock and other project-related uses.

Table 1.6.1. Aquatic Species Monitoring

Aquatic Species				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval/Year (depending on resource)
NED	NED07 to 23E02 (3 meadows SW of Chiquito Lake between trails – 501M45, 501M47, & YTPS8)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2009)
CLO	CLO01, CLO02,CLO07,CLO08, 26E38 to 25E06 (Jackass Meadow – Meadow Complex (8 meadows between trails – 505M44 through 505M49, 505M65, & 507M35)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)
CHQ	27E69	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur along riparian zone adjacent to trail (species currently occurs 930 feet from the analysis unit border); if located, monitoring would be to determine if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2009)
KAI	26E33 (Kaiser Pass Meadow – Meadow Complex (3 meadows adjacent to trail – 515M34, 515M35, & 515M36)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)

Aquatic Species				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval/Year (depending on resource)
KAI	Potter Pass Meadow and Round Meadow (515M31 & 515M32) near Potter Pass to Twin Lakes Loop trail [24E03, 26E31, 26E31]	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur (specifically for Round Meadow) or if declines in population numbers or deterioration of habitat conditions occur based on project activities (Potter Pass Meadow and Round Meadow if species is found)	Every 5 years (starting in 2007)
KAI	KAI02 - Walling Lake (trail and destination zone)	Aquatic Species - General Population and Habitat Surveys	Site has not been surveyed; if listed aquatic species are found, monitoring would be to determine if declines in population numbers or deterioration of habitat conditions occur based on project activities	Initial survey in 2007; every 5 years (starting in 2011) if listed aquatic species is found
KAI	26E06 (North of College Rock – 516M277)	Yosemite toad population counts / habitat condition	Meadow 516M277 has a record of a Yosemite toad from 1995; no surveys have been conducted since; To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Initial survey in 2007; every 5 years (starting in 2011)
KAI	25E41 (Mary's Meadow – Meadow Complex (trail goes through 3 meadows – 516M348, 516M349, & 516M352))	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2009)

Aquatic Species				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval/Year (depending on resource)
KAI	26E06 (0.2 miles to the east of the trail intersection with 25E40 – 516M366)	Yosemite toad population counts / habitat condition	Meadow 516M366 has a record of a Yosemite toad from 1995; no surveys have been conducted since; To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Initial survey in 2007; every 5 years (starting in 2011)
KAI	25E40 (Gloria Meadow – 515M6)	Yosemite toad population counts / habitat condition	Meadow 515M6 has a record of a Yosemite toad from 1995; no surveys have been conducted since; To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Initial survey in 2007; every 5 years (starting in 2011)
KAI	25E08 (East of Coarsegrass Meadow – Meadow Complex (trail is adjacent to 3 meadows – 516M264, 516M265, & 516M266))	Yosemite toad population counts / habitat condition	Meadow 516M264 has a record of a Yosemite toad from 1995; surveys in 2002 did not find the species; To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Initial survey in 2007; every 5 years (starting in 2011) if population is found
KAI	25E58 – Nellie Lake Meadow Complex (trail and grazing area, lake perimeter and 2 meadows – 516M373 & 516M374, destination zone)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project	Every 5 years (starting in 2007)

Aquatic Species				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval/Year (depending on resource)
			activities	
HNE	24E03 (north of Kaiser Pass Road; 5 meadows along and on trail – 516M290, 516M291, 516M292, 516M295, & 516M294)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
HNE	Intersection of HNE03 and 24E03 (just south of Kaiser Pass Road; 1 meadow between trails – 516M299)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
HNE	24E03 (south of intersection with HNE03; 2 meadows along trail – 516M310 & 516M311)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
HNE	Intersection of 26E08 and 24E03 (3 meadows east of Cow Camp – 516M303, 516M305, & 516M306)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
COO	COO01 (trail crosses through 2 meadows – 516M154 & 516M155)	Aquatic Species - General Population and Habitat Surveys	Site has not been surveyed; if listed aquatic species are found, monitoring would be to determine if declines in population numbers or deterioration of habitat conditions occur based on project activities	Initial survey in 2007; every 5 years (starting in 2011) if listed aquatic species is found

Aquatic Species				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval/Year (depending on resource)
COO	26E42 (Perkins Cuttoff; trails goes through and adjacent to 2 meadows – 516M107 & 516M112)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
COO	24E03 and 27E08 (Rock Meadow; trail and destination zone – 516M142)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2009)
DIL	DIL04 (trail goes through meadow 520M282)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)
DIL	DIL01 (trail goes through First Dinkey Lake meadow 520M275)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)
DIL	DIL03 (trail, destination zone, and grazing area at South Lake meadow 520M277)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)
DIL	DIL02 (trail to Swede Lake meadow 520M273)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration	Every 5 years (starting in 2007)

Aquatic Species				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval/Year (depending on resource)
			of habitat conditions occur based on project activities	
DIL	27E30 (trail and destination zone to Island Lake meadow 520M279 and perimeter of lake)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)
HEL	27E56 at intersection with 27E20 (trail goes through 2 meadows – 521M371 & 521M372)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
HEL	27E32 (just east of the intersection with 27E56; trail goes through and adjacent to 2 meadows – 521M361 & 521M362)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
NEL	NEL03 & 27E59 (Little Lake and meadow – 521M367; trail, destination zone, and grazing area)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
NEL	27E07 (trail adjacent to meadow – 521M310	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)

Aquatic Species				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval/Year (depending on resource)
NEL	27E09 at intersection with 27E07 (trail goes through meadow – 521M311	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
NEL	NEL01 & 27E09 (perimeter of Nelson Lake and 3 meadows – 521M303, 521M304, & 521M305; trail, destination zone, and grazing area)	Yosemite toad population counts / habitat condition	To determine if new occupied sites occur or if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2008)
DFC	Glen Meadow (grazing area – 521M261)	Relictual slender salamander presence / absence	To determine if population occurs; if found monitoring would be to determine if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)
DFC	DFC01, DFC04, DFC05, DFC06 trails & Mill Meadow Grazing Area (4 meadows – 520M109, 520M110, 520M111, & 520M112)	Relictual slender salamander presence / absence	To determine if population occurs; if found monitoring would be to determine if declines in population numbers or deterioration of habitat conditions occur based on project activities	Every 5 years (starting in 2007)

Vegetation

The selected alternative contains measures intended to reduce or eliminate direct and indirect effects for botanical resources and the soils and watershed functions that they require. Because the field assessments were conducted by an interdisciplinary team, the team identified resource protection measures during the field visits or in follow-up meetings and these measures were incorporated into the project proposal. When necessary, the team recommended that certain areas not be used because of resource concerns (e.g. see Table 2.22). Monitoring commitments in Table 1.6.2 are intended to gauge the effectiveness of the protective measures for botanical resources and to identify triggers for changes in management if these measures are not working.

Overall goals for protection of vegetation are:

- Preventing new infestations of invasive non-native plants due to pack station activities.
- Ensuring early detection of any weeds that do appear.

Control and eradication of existing populations of invasive weeds at pack station facilities.

Table 1.6.2. Botanical Resource Monitoring

Botanical Resources				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger or Reason	Interval
All units	Pack Stations, Facilities, Spike Stations, Corrals.	Noxious weeds	To ensure early detection of new infestations	25% of all sites each year in cooperation with County Agriculture Departments.
NED	Soquel Meadow	Fen and *Meesia triquetra*	Assess effects to fen and sensitive moss. Determine whether additional fen protection is necessary.	Every 3 years, then if stable or adequately protected, every 5 years
CLO	Sensitive plant population in Soldier Meadow pasture	Bolander's clover	Ensure that grazing is not causing population decline	Every 3 years
FLO	3 populations of sensitive plants along trails in AU	Mono Hot Springs evening primrose	To confirm the determination that pack station effects are negligible, or to alter management if unacceptable effects occur	Every 5 years
DFC	Glen Meadow	Fen, *Meesia triquetra* (sensitive moss)	Determine effects to fen and sensitive moss, protect fen if necessary	Every 3 years
NED	Bare Island Meadow	Meadow ecological status	To determine condition and trend	Every 5 years

Grazing Resources

Implementation of this monitoring plan can help sustain and/or improving desired conditions for meadows considered suitable to withstand use by pack stock under the selected alternative and will require coordination between the Special Uses Permit Administrator and the Rangeland Management Specialist. The monitoring included in this section is based on specific management direction described in Chapter 3 of the Grazing Resources section. Permit compliance and resource specific monitoring such as range readiness inspections, annual utilization monitoring and long term vegetation monitoring are key implementation components of this plan.

In addition, minimum impact stock management would be necessary to sustain grazing in meadows, particularly where only portions of meadows are considered suitable for grazing due to presence of critical areas. Minimum impact stock management techniques would also be adhered to by the pack station operators. The Packstock Management Guide in the 2001 Wilderness Plan provides specific direction for stock use and handling in the wilderness. Grazing strategies are to be developed for packer use areas and are to be described in annual operating instructions that will protect critical areas, which are habitats or features of particular concern because of their sensitivity to impacts or the habitat they provide for sensitive species. Examples include fens, spring heads, and breeding areas for Yosemite Toads.

Overall goals for protection of grazing resources are:

- Move toward or maintain desired conditions for meadow riparian vegetation;
- Utilize grazing practices that promote sustainable forage production for stock and wildlife;
- Utilize range management principles such as range readiness to adapt to seasonal fluctuations and timing of use; and
- Integrate efficient and clearly understood range management objectives into commercial outfitter and guide operating plans in order to effectively attain compliance.

The Packstock Management Guide (Appendix G - AA, JM DL Wilderness Plan) indicates goals and objectives that all rangelands are properly functioning and in satisfactory condition. Properly functioning riparian and meadows are defined as having adequate vegetation, landform or large woody debris present to dissipate energies associated with wind and water, filter sediments and aid flood plain development, improve flood water retention and ground water recharge, develop diverse pond and channel characteristics and support greater biodiversity. The Wilderness Plan defines satisfactory rangeland condition as being in a high seral ecological state with greater than or equal to 50% similarity to Potential Natural Community with stable soils, continuous vegetative cover and rooting throughout the profile.

Monitoring is proposed in key and selected critical areas. Key areas are established to be representative sites for the monitoring and assessment of a larger area and they are established in areas where use levels are expected to be average and in ecological types expected to respond early to use (USDA FS Pacific Southwest Region 1997). Since the grazing proposed under both action alternatives in this assessment is specific to meadows and pastures and not a

less defined "grazing area", the key area concept does not readily apply to this project proposal. Therefore the rationale for determining the location and frequency of grazing monitoring would be based on the records of most recent past use, as found in Table 3.54. The three meadows and two pastures where use was reported in 2 out of 3 years from 2003-2005 would initially be selected as key benchmarks, as these areas are considered the baseline indicator of the proposed level and predominant locations of use in the planning area. Monitoring would be adapted to authorized areas as use levels change in the planning area, however, not more than five meadows authorized for grazing would be monitored annually.

Table 1.6.3. Grazing Resource Monitoring

Grazing Resources				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval
NED	Bare Island Meadow	1) Utilization and streambank disturbance to determine compliance with standards and guidelines 2) Meadow ecological status to determine condition and trend	Based on use levels from reported during 2003	1) Annually 2) Every 5 years
NED	Biledo Meadow	1) Utilization and streambank disturbance to determine compliance with standards and guidelines 2) Meadow ecological status to determine condition and trend	Based on use levels from reported during 2003	1) Annually 2) Every 5 years
NED	Buffin Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use
NED	Dutchman Lake Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use
NED	Grizzly Creek Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use
NED	Tin Can Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use
NED	Upper Goat Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use
NED	Upper Iron Creek Meadow	1) Utilization and streambank disturbance to determine compliance with standards and guidelines 2) Meadow ecological status to determine condition and trend	Based on use levels reported during 2003-2005.	1) Annually 2) Every 5 years
NED	Soquel Meadow	1) Utilization and streambank disturbance to determine compliance with standards and guidelines 2) Meadow ecological status to determine condition and trend	Based on use levels from reported during 2003-2005.	1) Annually 2) Every 5 years
CLO	Soldier Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use

Grazing Resources				
Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval
KAI	NE Nellie Lake Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use
DFC	Glen Meadow	Utilization and meadow ecological status	If use reports indicate grazing activity is occurring	Based on reported use
DFC	Mill Meadow	1) Utilization and streambank disturbance to determine compliance with standards and guidelines 2) Meadow ecological status to determine condition and trend	Based on use levels from reported during 2003-2005.	1) Annually 2) Every 5 years
JM/AA	Referenced in 2005 Pack Stock Management FEIS			

Heritage Resources

Implementation of the FEIS will require monitoring as described in the *Programmatic Agreement among the Pacific Southwest Region, USDA Forest Service, California State Historic Preservation Officer, Nevada State Historic Preservation Officer, & the Advisory Council on Historic Preservation Regarding the Identification, Evaluation, & Treatment of Historic Properties within the Area of Potential Effect of Pack Station Operations & One Outfitter Guide Operation on the Inyo and Sierra National Forests, California & Nevada* (PA). Attachment 5 of the PA outlines the methodology and framework of the monitoring plan to be carried out by the Sierra National Forest.

Two types of monitoring have been identified by the PA: implementation monitoring and impact monitoring.

Implementation monitoring is to determine whether management actions implemented through the 2006 SUP FEIS ROD to protect historic properties are effective. This is also referred to as compliance monitoring, and is part of the compliance review conducted by the Special Use Permit administrator (see Special Use Permit Administration in Appendix A of the FEIS ROD). The permit administrator may ask for technical assistance from the Heritage Resources staff.

Impact monitoring is done in order to determine whether on-going activities associated with commercial pack stock have an impact on historic properties. A total of 45 heritage resource sites have been identified as impact monitoring candidates (see Table 1.6.4). These 45 heritage resource sites are considered to have ambiguous effects from commercial pack stock; ambiguous effects are ones where the presence of ongoing impacts to a heritage resource site is uncertain.

Of the 45 heritage resource sites identified as candidates for impact monitoring, a 25% sample (as directed in Stipulation 3.2 of the PA) will be selected for monitoring. This 25% sample will be monitored every other year, beginning in 2007, until the presence or absence of impacts from commercial pack stock is determined. If the presence of impacts is determined through monitoring, the Special Use Permit administrator will be notified, and actions to address the impacts will be employed in accordance with the PA.

Table 1.6.4. Heritage Resource Monitoring

Heritage Resources				
Analysis Unit	Site Name*	Monitoring or Evaluation Component	Trigger / Reason	Interval
NED	05-15-57-224 05-15-57-287 05-15-51-1253 05-15-51-1259 05-15-51-1262	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined

Heritage Resources				
Analysis Unit	Site Name*	Monitoring or Evaluation Component	Trigger / Reason	Interval
CLO	05-15-55-42 05-15-55-45 05-15-55-70 05-15-55-71/354 05-15-55-175 05-15-55-177 05-15-55-474 05-15-55-527 05-15-55-529 05-15-55-765 05-15-55-1179	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined
EDI	05-15-53-182/184 05-15-53-187 05-15-53-725 05-15-53-906 05-15-53-1058 05-15-53-1119 05-15-53-1122	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined
FLO	05-15-53-229/230 05-15-53-304/305	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined
KAI	05-15-53-77/247 05-15-53-323	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined
HNE	05-15-53-91 05-15-53-104 05-15-53-120 HNE Temp #2 05-15-53-121 05-15-53-122 05-15-53-248	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined
HNW	05-15-53-957	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined
COO	05-15-53-1063 05-15-53-1064 05-15-53-1066 05-15-53-1068 05-15-53-1069	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined
HEL	05-15-54-391 05-15-54-760	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined

Heritage Resources				
Analysis Unit	Site Name*	Monitoring or Evaluation Component	Trigger / Reason	Interval
DFC	05-15-54-123 05-15-54-656	Impact assessment	To determine the presence or absence of impacts	Every other year beginning in 2007, until the presence or absence of an impact is determined

*Listed here are monitoring candidates; a 25% sample will be selected for monitoring from the total number of monitoring candidates.

Watershed

Watershed monitoring is focused on:

1. Evaluation of the effectiveness of the Environmental Protection Measures listed in Chapter 2 of the 2006 SUP FEIS (and displayed in section 3.2.1) that were designed to remedy identified departures from Best Management Practices (BMPs) or Riparian Conservation Objectives (RCOs), or
2. Further assessment of conditions identified in baseline assessments with possible or minor departures from BMPs or RCOs, for which Environmental Protection Measures were not designed.

In both instances, the information will be used to determine whether additional environmental protection measures or adaptive management are necessary. The types of monitoring that will be utilized include:

- BMP assessment – This monitoring will use established evaluation protocols from the Best Management Practices Evaluation Program (BMPEP) User's Guide (USDA 2002). The effectiveness of specific one-time actions, such as moving the hitching rail away from the stream at the HSPS Florence Lake Spike Station, will be evaluated twice – one year after the measure has been implemented and again three years later. Provided that the final evaluation shows that the measure is effective and no adjustments are necessary, no further monitoring will occur. (Permit administration monitoring would ensure that the specified measures, once determined to be effective, continue to be followed.)
- Use trail assessments / trail assessments – This monitoring will use established protocols for rating trail segments, but with an emphasis on impacts to water quality. This information will be used to assess ongoing impacts through time, and could lead to additional environmental protection measures or the prohibition of use trails in the future.
- PFC and RCO assessments – PFC assessments (following the protocol in United States Department of Interior (USDI) 1998) have not been conducted in two pastures that will be authorized for use by commercial pack stock. These assessments are one of the components of RCO consistency (USDA 2004). Because these assessments will be repeated over time, they will also provide condition trend information that will be used to help ensure that stream channel condition and RCO consistency are at least maintained through pack stock management. Conditions trending downward due to pack stock impacts would trigger adjustments in management.
- Monitor headcut – There are two locations where grazing is authorized in meadows that contain small headcuts. The IDT determined that the level of grazing authorized is not expected to result in headcut migration or increased channel instability. These areas will be monitored in order to verify that such effects do not occur. There is no established protocol for this monitoring, which will consist of a site visit, photographs, and measurements of headcut dimensions and the length of unstable stream channel.

Table 1.6.5 lists the monitoring that will occur specifically for watershed resources.

Table 1.6.5. Watershed Resource Monitoring

Analysis Unit	Site Name	Monitoring or Evaluation Component	Trigger / Reason	Interval
NED	NED15	Use trail assessment	To determine effects of pack stock use of these trails on beneficial uses	Every 5 years
	Lower Iron Cr Camp Upper Iron Cr Camp S. Fork Merced Camp Biledo Camp	BMP assessment	To determine effectiveness of BMP improvements	2008 2011
CLO	MPS Miller Meadow Headquarters	BMP assessment	To determine effectiveness of BMP improvement	2008 2011
EDI	EDI02	Use trail assessment	To determine effects of pack stock use of this trail on meadow function	Every 5 years
FLO	HSPS Florence Lake Spike Station	BMP assessment	To determine effectiveness of BMP improvement	2008 2011
KAI	NE Nellie Lake Meadow	Monitor headcut	To determine whether packstock grazing in this meadow results in headcut migration	Every 5 years
	26E06A	Trail assessment	To determine whether this trail affects meadow condition	Every 5 years
HNE	D&F Main Pack Station Base Camp	BMP assessment	To determine effectiveness of BMP improvement	2008 2011
	D&F Badger Flat Spike Station	BMP assessment	To determine effectiveness of BMP improvement	2008 2011
DFC	Glen Meadow	PFC assessment, RCO assessment	To determine whether grazing management provides adequate protection for stream and meadow function	2007, then every 5 years
	Mill Meadow	PFC assessment, RCO assessment, Monitor headcut	To determine whether grazing management provides adequate protection for stream and meadow function	2007, then every 5 years
WIS	CPO Woodchuck Spike Station	BMP Assessment	To determine effectiveness of BMP improvement	2008, then every 5 years

Wildlife

Wildlife monitoring is based on:

- Locations for species within analysis units that overlap with project activities.
- The objective of the monitoring is to determine presence or absence of a species and determine if there are any potential conflicts.

Table 1.6.6. Wildlife Resource Monitoring

		Wildlife		
NED	Soquel Meadow	Willow flycatcher presence/absence survey	Determine presence of willow flycatcher	4 year cycle according to SNFPA 2004
DFC	Glen Meadow	Willow flycatcher presence/absence survey	Determine presence of willow flycatcher	4 year cycle according to SNFPA 2004

Toolbox

The following table identifies potential tools for an adaptive management approach to be used over time. All the possible outcomes of actions that may need to be modified or adjusted to meet desired conditions, changing conditions or requests for changes, have been considered. The Toolbox provides guidance to staff, pack station operators, the public, and line officers to help provide consistency in approach.

Unless otherwise noted, elements in the "When to use" column do not all need to be present. They represent different situations that may occur that drive either the need for action, or the need to evaluate and consider whether the tool is appropriate. This provides guidance and is not intended to replace the role and discretion of the decision maker to provide appropriate actions.

The 2005 Pack Stock Management FEIS ROD includes an approach to adaptive management called the "Toolbox" (pg. 50, Table 4). This ROD incorporates that document and expands its application to include the Kaiser and Dinkey Lakes Wilderness and the Merced Wild and Scenic River (MWSR). Under Alternative 3 the management concepts used for all four wildernesses and the MWSR are the same, consequently the toolbox is entirely applicable for these areas.

Table 1.7 Toolbox for Pack Station Adaptive Management

Tools	When to Use	How to Use
Designated sites		
Additional designated stock camp. Designated spot and dunnage site. Designated temporary hitch line.	1) When more than occasional competition (5 incidences a year) or conflict occur at destinations for the use of a campsite between pack stations, or between general public and pack stations. 2) When a need is identified and potential stock camps exist and no new impacts would occur OR an additional stock camp could be designed without adverse effect to resources. 3) When a need is identified and a suitable location with no identified risk factors and the use of the area would have no adverse effects to physical, biological, heritage or wilderness resources or the desired condition of the area. 4) When requested by operator.	District Ranger directs an interdisciplinary team to assess campsite, either through reports generated by Wilderness Ranger/Permit Administrator, or field visit. Evaluation must include: Heritage clearance, Assessment of trail access so that if risk factors are present they can be mitigated, BMP and assessment of potential compliance of BMPs with expected use levels (BMP Manual, 2000, p. 104), and If applicable, assessment of location's compatibility with wilderness recreation category and attributes of solitude, wilderness character and capacity. Designated site must be designed and inventoried according to protocol. Anticipated use level must be identified.
Assigned site (for individual pack stations).	1) When an operator requests to have an assigned site reserved for their use only and it is an existing designated stock camp. 2) When no conflicts between operators would likely result.	Follow procedures for assigned sites in Forest Service Handbook 2709.11 Section 37.21 (h).
Remove a Designated Stock Camp from use.	1) If BMP compliance cannot be met 2) If site has not been inventoried and designed within two years (2008).	Prohibit use of site in annual operating plans.
Day rides		
Designated Day Rides	When an operator requests day rides on system trails into the Dinkey Lakes Wilderness.	Interdisciplinary team will assess day rides upon request.

Tools	When to Use	How to Use
Use Trail Management		
Stabilize use trail.	1) Use trail shows signs of deterioration and instability under current use and this use is otherwise consistent with destination management. 2) Few risk factors are present that would cause continuing impacts once the trail is repaired. 3) Repairs are incidental, (such as primitive barriers and user redirection/realignment or low-profile drainage or stabilization structures) and these would not change the generally undeveloped character of the use trail.	Wilderness Ranger/Permit Administrator evaluates UT during normal monitoring cycle, or reports of unusual impacts. Identify key point features or areas of impact, and the presence of risk factors as well as assessment of potential repairs. If repairs are of incidental scale and can be implemented without changing the general undeveloped character of the use trail and there would be minimal off-trail disturbance, wilderness manager determines prescription for repairs. If work has potential to change character of trail or may disturb off-trail resources, Wilderness Manager consults with appropriate specialists prior to implementation.
Add use trail to system inventory and maintain/manage as system trail.	1) Use trail is showing signs of degradation which require more than incidental management or treatments to stabilize, but could be corrected through standard trail treatments. 2) Use trail is being used by commercial and non-commercial public at moderate to high levels, and is likely to continue. 3) Use is consistent with other management criteria at destination, and is best served with a managed transportation system.	Wilderness Ranger/Permit Administrator evaluates UT during normal monitoring cycle, or reports of unusual impacts. Identify key point features or areas of impact, and the presence of risk factors as well as assessment of potential repairs. Appropriate specialists assesses trail issues, either through reports generated by Wilderness Ranger/Permit Administrator, or field visit if potentially large extent or controversial. Evaluate: Level of current and future work needed; whether this work may have effects on heritage or other resources (if so, conduct appropriate surveys); what level of trail development is appropriate for anticipated use type and levels, recreation category and destination management. Disclose intent of adding trail(s) to system to public, and conduct appropriate planning and environmental process.

Tools	When to Use	How to Use
Approve a use trail not currently approved.	1) Access is requested to an area within or in close proximity to an existing approved destination *(see destination boundary adjustment, below);* OR, access is requested on a UT which was previously prohibited. 2) Use to destination is otherwise consistent with desired conditions. 3) Conditions which originally created the need to prohibit use have changed or been corrected. 4) Route is deemed to be stable at the anticipated use level.	Wilderness Ranger/Permit Administrator evaluates UT after request. Identify key point features or areas of impact, and the presence of risk factors as well as assessment of potential stabilization. Interdisciplinary team assesses trail issues, either through reports generated by Wilderness Ranger/Permit Administrator, or field visit if potentially large extent or controversial. Evaluate trail stability and consistency with destination management, and assign appropriate level of use at destination.
Remove use trail from use by Pack Station.	1) Use trail shows signs of deterioration and unacceptable impacts of resources, *and* 2) Risk factors exist which would make it highly unlikely the use trail could be stabilized without unacceptable changes in the trail character. 3) Impacts to TES, Heritage Resources, or other critical resources cannot be mitigated with continued use. 4) Removal of use by pack station will substantially correct use trail issues. Other non-commercial use types and levels will not likely perpetuate continued problems if pack stock use is removed.	Wilderness Ranger/Permit Administrator evaluates UT during normal monitoring cycle, or because of reports of unusual impacts. Identify key point features or areas of impact, and the presence of risk factors as well as initial assessment of potential mitigation. Interdisciplinary team assesses UT issues, either through detailed reports generated by Wilderness Ranger/Permit Administrator, or field visit, if potentially large extent or controversy. IDT evaluates: Extent of physical mitigation and potential change in character needed to stabilize impacts if use were to continue, risk factors, future maintenance considerations, effects on TES, heritage, or other resources, and consistency with Recreation Categories and destination management; also, extent to which commercial stock use is creating the impacts and expectations for improvement with removal of commercial stock.

Tools	When to Use	How to Use
Destination Quota Adjustment		
Reduce levels or prohibit use at a destination.	Impacts at destination, including trails, use trails, grazing areas, campsite conditions etc, are deteriorating. Conflicts become apparent between commercial visitors, and /or between commercial and non commercial visitors.	District Ranger directs an assessment of the destination in question to determine if standards, guidelines and desired conditions are being met. Adjustments should be made based on this assessment. Resource impact ratings from baseline assessment should indicate conditions are deteriorating and commercial pack stock use may be a contributing factor.
Adjust destination quota upward.	Identified work is accomplished as identified in DMS (such as trail is repaired or improved). Desired condition is met and commercial operator identifies an ability to increase use and maintain condition. Requested by operator.	District Ranger directs an assessment of the destination in question to determine if standards, guidelines and desired conditions are being met. Adjustments should be made based on this assessment. Resource impact ratings from baseline assessment should indicate improved conditions.
Destination boundary adjustment.	Commercial operator demonstrates recent past use (within 10 years) occurred outside but adjacent to the current boundary of a destination.	District Ranger should direct an assessment of the locations in question and document conditions including presence of risk factors and determine if standards, guidelines and desired conditions are being met. Adjustments should be made based on this assessment.
Add a new destination.	Upon request by pack station.	Interdisciplinary team assessment, including destination attribute rating, photo-point identification, campsite inventory, and trail and/or use trail assessment.
Allow case-by-case destination use for hunting.	Upon request by pack station, at least two weeks prior to hunting season.	Wilderness manager assesses location and will need to determine that there are no concerns with the level of use, and it will not have any adverse effects to trails, campsites, and/or cross country travel will not lead to trailing impacts.
Modification of Stock at One Time in the Wilderness.	Upon request by pack station or when the FS determines unacceptable impacts to be occurring.	District Ranger will direct an assessment of the locations affected by stock at one time and document conditions including presence of risk factors and determine if standards, guidelines and desired conditions are being met. Adjustments should be made incrementally based on this assessment.

Tools	When to Use	How to Use
Trail Suitability		
Designate trail that is currently available to commercial stock use as "Not Suitable for Commercial Stock".	1) Trail shows signs of deterioration and unacceptable impacts of resources, *and* 2) Risk factors exist which would make it highly unlikely the trail could be stabilized without unacceptable changes in the trail character. 3) Impacts to TES, Heritage Resources, or other critical resources cannot be mitigated under continued commercial stock use. 4) Removal of use by pack station will substantially correct issues. Other non-commercial use types and levels will not perpetuate continued problems if pack station use is removed.	Wilderness Ranger/Permit Administrator or trail staff evaluates trail during normal monitoring cycle, or because of reports of unusual impacts. Identify key point features or areas of impact, and the presence of risk factors as well as initial assessment of potential mitigation. Interdisciplinary team assesses trail issues, either through detailed reports generated by Wilderness Ranger/Permit Administrator, or field visit if potentially large magnitude or controversial. IDT evaluates: Extent of physical mitigation and potential change in character needed to stabilize impacts if use continues, risk factors, future maintenance considerations, effects on TES, heritage, or other resources, and consistency with Recreation Categories and destination management; also, extent to which commercial stock use is creating the impacts and expectations for improvement with removal of commercial stock.
Make trail which was previously designated NSCS or "NSCS until repaired" available to commercial stock.	1) Use is requested for trail that was formerly designated "NSCS until repaired" or NSCS. 2) Use to destination is otherwise consistent with desired conditions. 3) Conditions which originally created the need to prohibit use have changed or been corrected. 4) Route is deemed to be stable at the anticipated use level.	Focused field assessment and report by Wilderness Ranger/Permit Administrator verifying that trail has been adequately stabilized. Review by IDT. IDT evaluates: mitigation of key impacts has occurred, impacts to TES, heritage and other resources not likely to occur by reopening trail. Limiting factors that determine level of destination use after trail is available. Trails which were designated as NSCS until repaired are cleared in the Operating Plan. Trails that were designated NSCS go through appropriate public process to amend current decision.
Allow early season trail opening (i.e.shoveling, sanding).	1) Request for shoveling, sanding . (This can occur prior to access). 2) Identified concern with trail or destination.	Identify key locations that indicate destination or trail readiness based on intended trips. Site visit to key locations prior to access being granted.
Facilities		

Tools	When to Use	How to Use
Modifications to Master Development Plan	Request by operator	Permit administrator evaluates request and determines appropriate level of environmental analysis. Follow policies outlines in FSH 2709.11
Grazing Management		
Allow grazing outside of an authorized meadow, pasture, or grazing zone.	1) Request by packer. 2) Nearby authorized grazing area at capacity. 3) Authorized area is too far from destination to be used. Destination should be no greater than ½ mile.	Interdisciplinary team visits proposed grazing area, assesses condition and suitability. Team members will as a minimum be wilderness, hydrology, range, botanist, heritage, and wildlife specialist. If determined to be suitable, the IDT completes meadow evaluation, ecological status (Rapid Assessment Process from 2001 Wilderness Plan, Assessment of Benchmarks, Appendix G, page 7), Proper Functioning Condition assessment, designates any critical areas, estimates initial stock nights available, and identifies any needed mitigations.
Increase or decrease stock nights temporarily (during a season for the remainder of that season only) within an authorized meadow, pasture, or grazing zone.	Change in annual conditions such as wet or dry year or consecutive years indicates productivity may be higher or lower than normal or a request by packer for an increase, and adequate monitoring data shows that utilization and other standards have not yet been reached.	Adequate monitoring data includes photographs and vegetation utilization measurements for key areas (Grazing Response Index method as described in the 2001 Wilderness Plan Appendix G, page 10) and streambank alteration measurements (R5 Rangeland Analysis and Planning Guide, Point Method, pages 5-10 to 5-15). Adequate monitoring data also includes photo-points in critical areas and written critical area evaluations.

Tools	When to Use	How to Use
Increase stock nights in existing key area or grazing zone (long term, for more than one season).	Upon request by pack station.	If current monitoring of vegetation utilization (Grazing Response Index method as described in the Wilderness Plan Appendix G, page 10), critical area protection, stream bank alteration (R5 Rangeland Analysis and Planning Guide, Point method), and trend monitoring (see Assessment of Benchmarks, Appendix G, page 7) shows that standards for stream condition and vegetation composition are obviously being exceeded, then an interdisciplinary team (members will be hydrology, range, and wildlife specialist) re-calculates stock nights of forage available and identifies any management needed to allow allocation. "Degraded meadows and streams will have obvious upward trend in condition and function" (2001, Wilderness Plan ROD, page 17): Therefore, for vegetation, a representative sample indicates that the majority of the meadow (over 50%) must be in high seral condition and no more than some isolated, or patchy changes away from the potential natural plant community, over less than 1/3 of the area. Stream PFC analysis must show an obvious upward trend in stream functional condition. No headcuts can be deeper than the rooting depth of adjacent potentially stabilizing vegetation or in the lower 1/3 of the meadow. If there is a portion of the meadow with insufficient recovery, it can be excluded from the area able to be grazed. The area with sufficient recovery can be opened, and methods such as fencing, hobbling, etc. can be used to prevent access into the remaining degraded areas.

Tools	When to Use	How to Use
Reduce stock nights in existing key area or grazing zone or rest meadow.	1) Monitoring shows that grazing area is not meeting standards/desired conditions. 2) More critical areas are found in grazing area.	If monitoring shows that meadow vegetation or stream condition in downward trend, or utilization or trampling standards are not being met, modify grazing management if possible, or suspend grazing if modification is not sufficient. See monitoring plan for specific monitoring protocols. Use the Grazing Response Index method (Wilderness Plan page 24, and Appendix G) to determine if utilization standards are being met. For trampling, use the Point Method for measuring streambank alteration. For stream condition, use the PFC protocol.

Tools	When to Use	How to Use
Allow grazing in an area rested due to resource impacts.	Upon request by pack station.	Rest continues until an interdisciplinary team establishes baseline monitoring and then accomplishes subsequent monitoring that quantifies an upward trend with resource conditions sufficient to sustain grazing and stock entry (see Assessment of Benchmarks, Appendix G, page 7). Once this monitoring confirms satisfactory rangeland condition (see Glossary) the IDT then completes a meadow evaluation (including PFC) and identifies any critical areas or mitigations needed. District Ranger reviews information and directs appropriate environmental process. "Degraded meadows and streams will have obvious upward trend in condition and function" (2001, Wilderness Plan ROD, page 17): Therefore, for vegetation, a representative sample indicates that the majority of the meadow (over 50%) must be in high seral condition and no more than some isolated, or patchy changes away from the potential natural plant community, over less than 1/3 of the area. Stream PFC analysis must show an obvious upward trend in stream functional condition. No headcuts can be deeper than the rooting depth of adjacent potentially stabilizing vegetation or in the lower 1/3 of the meadow in the portion of the meadow where grazing would occur. If there is a portion of the meadow with insufficient recovery, it can be excluded from the area able to be grazed. The area with sufficient recovery can be opened, and methods such as fencing, hobbling, etc. can be used to prevent access into the remaining degraded areas.
Open meadow that is closed due to trail problems.	Trail repair or relocation is completed.	If meadow has been analyzed by ID team and found suitable except for trail issues, open meadow to grazing and calculate stock nights. If meadow has not been analyzed, interdisciplinary team visits meadow and determines suitability and capacity.

Tools	When to Use	How to Use
Identify additional critical areas.	Surveys, monitoring, or other reports of a previously unknown Yosemite toad population, sensitive riparian plant species population, fen, or other resource concern within a grazing area.	Appropriate specialist confirms presence of a critical area. District Ranger directs an assessment of the impacts and effects to critical areas. If no negative impacts are identified, District Ranger can direct staff to adjust estimated grazing capacity so that critical area is not included in calculation and inform permit administrator and packer(s) of presence of critical area and new capacity. If there are negative impacts, District Ranger works with permit administrator and packer(s) to develop a grazing strategy that will protect the critical area.
Use of Temporary (i.e.Electric Tape Type or "Quick Corral", but may be barbed wire or other fence type depending upon assessment) Fence for exclosure, enclosure or drift fence.	Packer proposes to use temporary electric "Quick Corral" type fence or other temporary fencing to either exclude stock from a critical area or keep stock within a suitable area or to contain stock as in a drift fence situation. Use may be one time to the entire season.	The Permit Administrator consult with Range and Wilderness Staff and other staff to determine whether additional work is needed (such as Botanical and Heritage Resources) and documents in permit file the resulting determination of the suitability and feasibility of using temporary fence at the proposed location. The fence location and duration are detailed in the Annual Operating Plan, or in a mid-season letter amending the AOP. Staff will consider and identify the location and the shortest time period that will accomplish the stock containment or resource protection needed. Staff will consider and identify the location and the shortest time period that will accomplish the stock containment or resource protection needed. District Ranger directs analysis, evaluates assessment and makes decision. Ensure completion of Section 106 prior to approval.
Drift Fences		
Add drift fence.	Packer proposes new fences or, Grazing zones requires resting and fences provide protection for meadow.	District Ranger directs staff to conduct a minimum requirement analysis and appropriate environmental analysis.
Remove drift fence.	No longer serves to protect resources or fulfill stock management objectives, or Fence falls into disrepair and/or has not been used for five years, or Fence used only for convenience to hold stock for packer, not for resource protection.	District Ranger directs appropriate specialists and permit administrators to prepare evaluation of the effectiveness of the drift fence then determines appropriate course of action. Ensure completion of Section 106 prior to removal of drift fence.

Tools	When to Use	How to Use
Extend or relocate existing drift fence.	Upon request by operator, and other approved practices have failed (e.g. use of electric fence) or, Significant resource issues occur related to commercial stock grazing or, Where stock management problems lead to unsafe situations for visitors. FS determines unacceptable, unmitigatable resource impacts or conflicts at current site of drift fence and the drift fence has been determined to be necessary.	Appropriate specialists assess need for drift fence vs. other alternative stock management practices. Alternative less intrusive stock management practices have been demonstrated to be unsuccessful. Fence is shown to be last resort and compliant with all current policy and standards. Environmental analysis is completed for construction of new facility in the wilderness. Ensure completion of Section 106 prior to relocation of drift fence.
Campfires		
Allow campfires by pack stations in areas above elevational closure.	Upon request by pack station	District Ranger directs an assessment of proposed area that includes proximity to other visitors camping and potential conflicts.
Adjustments to elevational fire closure.	When firewood availability is abundant enough to support campfires above 10,000 or 10,400 foot elevational closure. When firewood is not available in enough abundance to support continued campfire use When requested by packer	If campsite inventory indicates that enough campsites (at least more than 2 sites rated at a "3" or lower for firewood availability) and no conflicts with adjacent areas or within a destination would occur. When firewood ratings from campsite inventory rate out at "4" and "5" at any given destination, area should be closed to campfire use.
Party Size		
Identify party size limitations.	When reports indicate campsite will not accommodate large number of campers or pack stock without going outside the existing site.	District Ranger directs wilderness manager or permit administrator to evaluate site during normal monitoring cycle, or as a result of reports of unusual impacts. Consider current/recent past tally sheet use reports to determine appropriate party size.
Historic Properties Management Plan (HPMP)		
Management of heritage resources.	When operations occur in the vicinity of a known heritage resource.	Direction will be provided in the HPMP for each site within the operating area.
	1) Discovery of heritage resources. 2) Inadvertent effect	Modify HPMP.